## Office Memorandum . United Stales Government

TO : Harold L. Price, Director, Division of

Licensing and Regulation, Washington

(THRU E. J. Bloch, Director, Division of Production

FROM: R. C. Blair, Manager

Savannah River

SUBJECT: NOTICE OF PROPOSED RULE MAKING

SYMBOL: I:HBR:mep

Reference is made to your memorandum of May 26, 1959, on the above subject. While it is recognized that specific criteria in individual cases may not be controlling, we wish to point out that under the proposed issuance it is possible that the site of the PRDC reactor in Michigan would be judged adversely under paragraph b. of the proposed criteria, since it is practically impossible for the operator to control the lake immediately adjoining the reactor site, which is included in the minimum radius.

It is also suggested that the standard for exclusion distance around power and test reactors may make it impracticable to build and operate test or power reactors in heavily populated states. A large power reactor could require the ownership and control of some 1100 acres of land or more, while a test reactor may require ownership of an even larger acreage. The cost of such large acreage may be a substantial factor in total capital cost of the reactor.

cc: E. J. Bloch

7/1/59 Bentes Files

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DATE: