

ATOMIC POWER DEVELOPMENT ASSOCIATES, INC.

1911 FIRST STREET
DETROIT 26, MICHIGAN

June 25, 1959

United States Atomic Energy Commission
Washington 25, D. C.

Attention: Division of Licensing and Regulations

Gentlemen:

This letter relates to the notice of proposed rule-making published in the Federal Register of May 23, 1959 (p. 4184), regarding criteria for evaluation of proposed sites for nuclear power and test reactors. Our comments follow:

The minimum radius of one-quarter mile for power or test reactors, which might be as great as one-half to three-quarters' miles in the case of a large power reactor, appears to be a rule which would exclude most power reactor sites in the United States. This is due to the requirement that the said exclusion area be "under the complete control of the licensee." In order to obtain cooling water most power plants in this country are located on rivers, many of which are navigable and therefore under the jurisdiction of the United States Government. It therefore would appear impossible for a licensee to obtain the "complete control" envisaged by the proposed rule. It appears that it is reasonably possible to obtain sites which have distances on the land side approximately equal to those which would be required by the proposed rule, and it would appear to us sufficient that the water side be controllable by the licensee or by appropriate federal, state, or municipal agencies during a period of hazard such as might follow a reactor incident at the facility. For instance, if a navigable river were the body of water in question, the Coast Guard or other agency could close the river to navigation within the required distance up and down stream from the reactor.

We also have a comment on Section c of the proposed rule concerning population density in surrounding areas. The proposed rule states that it would be undesirable to locate a power or test reactor near an air field, arterial highway or factory. This section of the proposed rule should be clarified or extended to indicate the position of the AEC if a large factory, arterial highway, or air field was proposed for construction near an already existing nuclear power plant.

In general, we question whether the time has yet come to fix site criteria by general regulation. A further accumulation of experience would seem to be desirable before such a general regulation is issued.

Respectfully yours,

Alton P. Donnell
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General Manager

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Comment