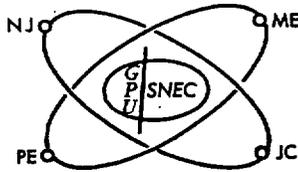


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S. XTON NUCLEAR EXPERIMENTAL CORPORATION

GENERAL PUBLIC UTILITIES SYSTEM

JERSEY CENTRAL POWER & LIGHT COMPANY
NEW JERSEY POWER & LIGHT COMPANY
PENNSYLVANIA ELECTRIC COMPANY
METROPOLITAN EDISON COMPANY

P. O. Box 542, Reading, Pa.

Telephone: Laureldale Walker 9-3601

July 16, 1959

Mr. Harold L. Price, Director
Division of Licensing and Regulation
U.S. Atomic Energy Commission
Washington 25, D.C.

Dear Mr. Price:

This letter is written in answer to the invitation by the Atomic Energy Commission to submit comments and suggestions on the recent notice of proposed rule making pertaining to the formulation of an amendment to AEC regulations to state site criteria for evaluation of proposed sites for nuclear power and test reactors.

While we believe that it would be helpful for the Commission to describe more clearly the types of matters, both as they affect reactor design and site selection, which the Commission must take into account in the issuance of construction permits and operating licenses, we do not believe that the issuance of a regulation at this time is desirable. Specific comments are set forth below on various features of the proposed regulation which indicate some of the reasons why in our opinion it should not be issued.

Factor b of the proposed "rule" provides for an exclusion area under "complete control" of the licensee. Since in many cases navigable waterways, railroads, highways or other occupied land may be involved over which it is not possible to obtain ownership, the words "complete control" seem too strong. In the past the Commission has usually recognized the possibility of closing public rights of way in case of an emergency and has also recognized emergency evacuation procedures which might be interpreted as less than complete control.

Factors b and c pertaining to the exclusion area required and the population density in the surrounding area outside the exclusion area may cause some difficulty since the minimum exclusion radii specified and the minimum distance from towns or cities could be construed as definitive criteria. We agree with the second paragraph of the notice which states that due to the complex nature of the environment, the wide variation in environmental conditions from one location to another and the variations in reactor characteristics and associated protection which can be engineered into a reactor facility that definitive criteria for general application to siting problems cannot be set forth. While it is understood that the AEC Hazards Evaluation Branch personnel are aware of the complex nature of all the factors involved and will not enforce a strict interpretation of the definitive criteria being suggested as usually being required, there does seem to be a danger that other groups or organizations in the local area

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where the proposed reactor is to be built might use such definitive criteria as an argument to delay or even prevent the building of a proposed reactor.

Rather than specify the minimum radii of the exclusion area for power and test reactors, it would be more helpful to reactor plant designers to define the exclusion area in terms of the maximum credible accident radiation level permissible at the site boundary. It would also be helpful to the reactor designer to publish methods of analysis that can be used for determining the maximum credible accident radiation level effects for different types of reactors.

We agree that until more operating experience is obtained with power and test reactors that sites having a small population density in the surrounding area are desirable. It is possible, however, to have an excellent site from the standpoint of population density and still have less than the suggested minimum distance to the nearest town or city. It would seem to us that a combination of conditions such as low population density in the surrounding area, a reactor type for which there is considerable knowledge and experience, favorable meteorological conditions, and provision of a vapor container and adequate shielding would more than offset the requirement that the reactor be located several miles from the nearest town or city. Since there is an indication from the wording of paragraph c, Population density in the surrounding area, that the above factors will be taken into consideration and that exceptions will be made, we would suggest that any reference to minimum distances from the nearest town or city be deleted. Proximity of reactors to towns or cities should be considered; however, we do not believe it is desirable to imply arbitrary limits that may prevent use of the best engineering ingenuity to improve flexibility in placement of future nuclear power plants.

Very truly yours,


D. R. Rees,
General Manager

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