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July 22, 1959

Clifford K. Beck, Chief
Hazards Evaluation Branch

CONFERENCE WITH PUBLIC HEALTH OFFICIALS ON SITE CRITERIA

Those present: Dr. James Terrill - U. S. Public Health
Mr. Jack Nelson - " " " "
Mr. R. S. Daniels - " " " "
Dr. Clifford K. Beck - U. S. Atomic Energy Commission

In response to suggestions from Public Health officials, a meeting was set up to hear and discuss informally the suggestions which Public Health proposed to make on the published site criteria on which there was a request for public comments. At the outset of this meeting (on the above date in Dr. Terrill's office), Dr. Terrill stated that many matters were unfortunately now so involved with politics that, for one reason or another, almost anything which one might write or say could find its way into the newspapers with embarrassing consequences. For this reason, they had desired very much the opportunity to discuss with us (AEC) their informal comments and suggestions on the published site criteria in order that they would know whether or not we would have any difficulty with any of the suggestions they might have to make.

I replied that we certainly knew from past experience that things could find their way into the newspapers, and we were pleased to have the opportunity to discuss informally the suggestions Public Health might have on the site criteria.

Dr. Terrill then produced a four page memorandum entitled, "Points for Discussion with Representative from Division of Licensing and Regulation, AEC," and/ then followed a discussion on the contents of this memorandum. there

In the discussion it quickly became apparent that the contents of the Public Health memo could be divided into two parts: 1) Specific suggestions of minor revisions of and additions to the criteria published in the Federal Register, and 2) USPH recommendations of substantial addition to the site criteria of procedural matters relating to involvement of local and state authorities in the licensing process. Paragraph 2, page 1, item 5 and item 12 of the PHS memo, dealt with this point.

It was the writer's recommendation that this matter related to procedural issues and could not be properly included in the

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intended scope of the regulation presently under discussion which related entirely to factors which need to be considered in the site selection process; not to procedural means by which such evaluations would be carried out. The writer expressed his thanks to PHS officials for their time and attention to the various items comprising site criteria, and stated that we would be pleased to have their comments and suggestions on these items, but repeated that the procedural issues raised by PHS related to entirely different matters. PHS agreed that they would reconsider the contents of their memo before submitting it to AEC.

A copy of the discussion memo is attached hereto.

Enclosure:
As stated

cc: Harold L. Price w/Encl.

OFFICE ▶	HEB:DI&R				
SURNAME ▶	CKBeck:jsn				
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POINTS FOR DISCUSSION WITH REPRESENTATIVE FROM
DIVISION OF LICENSING AND REGULATION, AEC

The following comments are made in response to your request of May 26, 1959 relative to the Atomic Energy Commission's notice on proposed rules making on site selection published in the Federal Register on May 23, 1959.

It is our feeling that the criteria for site-selection as set forth in this document are not self-explanatory nor of sufficient detail to provide satisfactory guidance in the siting of nuclear energy plants. We propose the development of a technical manual in the form of a check list which sets forth in detail the definitive criteria for general application to the problems of selecting the site for a nuclear energy facility.

The basic regulation document on site-selection should be in concise form directing sponsors of nuclear energy plants to contact responsible Federal, State and local health officials to determine local site requirements. (i.e., zoning, city and regional planning, construction and waste disposal permits). The sponsor would then be further directed by this basic regulation to utilize the guidelines of the technical manual to develop the proposal for the siting of their reactor in the location under consideration.

Specific comments regarding the content of the notice have been obtained from Division Staff and are attached.

COMMENTS FROM REVIEW OF AEC "PROPOSED RULE MAKING-AEC SITE CRITERIA"

1. The use of the word "credible accident" in section a. is undesirable. No accident to date has been credible. Human errors cannot be evaluated by rule making. The phrase "maximum accident for design purposes" is suggested.

2. In section a. the use of the phrasing "undue hazard" is not appropriate. The people in the area should be made aware of the potential hazard and risks involved and allowed to balance these against the benefits derived from the industrial utilization of nuclear energy.

3. "Environmental utilization" is suggested as the title for section c. This titling would then refer to the character as well as the density of the population. It would require consideration of the problems of siting in agricultural areas and the location of reactors near any essential operation whose shut-down could not be counteracted (water reservoirs, shellfish beds, highways, air fields).

4. Section f. Provisions should be made to prevent "leaks" from entering the environment by interception, holding or diversion. Stable salt concentrations of the materials released have a great effect on the movement of specific radionuclides to the soil and should be investigated.

The up-take of materials by biological forms is an important criterion relating to the release of specific radionuclides into the stream environment. The chemical composition of receiving waters and the uses of the stream system should be studied.

The notice omits any reference to the public relations aspects of site selection. Keep the public informed as plans for site development.

6. The notice fails to mention the possibility of the situation of permissible levels for each of a number of facilities discharging to a common environment.

7. Section d. fails to mention the possibility of flood conditions.

8. Impermeable soils may not be desirable. In some areas, in Alaska for example, the soil, though impermeable in character, is laid down in such a fashion that contaminant may move long distance underground while hidden from surface inspection.

9. Add to final paragraph of notice: "Site evaluation should be made on the basis of minimizing the hazard from the reactor."

10. Consider the population density factor in terms of RSH per million population in addition to the maximum exposure per individual.

11. The exclusion distance for reactor from population center must be determined for each case and generalizations may create more problems than they solve.

12. The succession of steps in planning and obtaining necessary approval for a nuclear energy site should be as follows:

a. Initial approach to authority

The nuclear energy plant sponsor should approach responsible federal, state and local authorities in the area with basic

and desirable to insure authorities concerned
to comply with site requirements of their

Notice and Receipt of Comments

Appropriate public notice of intention to construct
be filed and a 60 days period for intervention should be allowed

Notice of permit to construct (present AEC procedure)

Notice of license to operate (present AEC procedure)