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Office Memorandum • UNITED STATES GOVERNMENT

TO : Harold L. Price, Director
Division of Licensing and Regulation
Washington

DATE: JUL 31 1959

FROM : E. C. Shute, Manager *E.C. Shute*
San Francisco Operations Office

SUBJECT: NOTICE OF PROPOSED RULE MAKING

SYMBOL: T:TLD

Reference is made to your May 26, 1959 memorandum on the above subject. Below is a summary of comments from some of our contractors and the staff at SAN. These comments may or may not affect the language of the proposed amendment to the regulations but they are, in our opinion, comments which should be borne in mind in the implementation of a regulation concerning site criteria.

Page 1 - Paragraph a:

We believe that the terms "power reactor" and "test reactor" should be defined. If they are not defined confusion or misrepresentation may result. Test reactor applicants might be encouraged to describe their facilities as "research reactors." Similarly, the VBWR might be described as either a "Developmental" reactor or as a power reactor.

Page 2 - Paragraph b:

This paragraph states "Each power and test reactor should be surrounded by an exclusion area under the complete control of the licensee."

1. It appears that the language of this requirement would automatically classify the exclusion area as a "restricted area" in terms of the definition appearing in 10 CFR Part 20. Is this the intent? Allowable exposures to radiation, permissible levels of radiation and other requirements, such as the necessity for instruction of personnel (Section 20.206 of 10 CFR 20), are considerably different for restricted and unrestricted areas.
2. Many power reactors will probably be located on the banks of rivers. How does one establish an exclusion area with a minimum radius of one-fourth mile under such circumstances? We believe all of these requirements should have exemption clauses to cover such circumstances.

None for PDRm

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Page 2 - Paragraph c:

It is noted that this limitation pertains only to "power and test reactors." Certain research reactors (e.g., Brookhaven and MIT) are in the megawatt power range and therefore maintain substantial fission product inventories. It would seem more realistic to establish population density requirements on the basis of anticipated exposure to off site personnel which would result from the maximum credible accident under the most pessimistic meteorological conditions.

Page 2 - Paragraph e:

According to the Final Summary Safeguards Report for the General Electric Test Reactor (GEAP-2064), the Williams Fault passes directly underneath the Vallecitos Laboratory site. Other site locations on minor faults might also be acceptable. It is therefore suggested that insertion of the word "major" before fault would provide a better guide.

