

**COMMONWEALTH  
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**POWER AND TEST REACTORS  
AEC Notice of Proposed Rule Making**

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

Gentlemen:

Attention: Director,  
Division of Licensing and Regulation

In accordance with your extended invitation for comments on the proposed rule making for Power and Test Reactors, we are submitting these following comments:

1. Definitive rules should not dictate the detailed design of a reactor in relation to an acceptable site but should permit the engineer to meet specified limitations in the most economical manner available. Therefore, definitive rules should apply to the amount of radioactive particle emission permissible from a reactor site following a maximum credible accident. Naturally these same definitive rules should also specify the mode of event probabilities for establishing these credible accidents.

2. The use of the proposed rules as stated does not appear to assure the prospective builder that a site which he believes most safe within economical limitations, and which has been approved by the Safeguards Committee for reactor construction, could receive a permit for operation of a reactor after it had been built. It is believed that this large risk will greatly retard the development of nuclear power and that the rule could be reworded so that a site approved for reactor construction would have reactor design limitations spelled out to the extent that when the reactor was completed to meet the limitations an operating permit would be assured.

We are aware of the AEC's attempt to make the necessary calculations that would provide the definite limits of radioactive particle emission from a reactor site and appreciate the difficulty of this problem. Nevertheless, the uncertainty of receiving an operating permit after completing construction of a nuclear plant is a serious problem.

Yours very truly,

*J. R. North*

J. R. North

SE/jc

*Cys for Pub Doc Rm and to OGC 8/31*

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*(Part 150 Comment)*