NSP

NORTHERN STATES POWER COMPANY

MINNEAPOLIS 2 MINNESOTA

May 5, 1961

Secretary
United States Atomic Energy Commission
Washington 25, D C

Attention Director, Division of
Licensing and Regulation

Dear Sir

In the release by the Atomic Energy Commission dated February 10, 1961, there was presented for public comment an outline of reactor site criteria guides. Our Company is engaged in the construction of the Pathfinder Atomic Power Plant Project near Sioux Falls, South Dakota, and is quite naturally interested in the site criteria.

We have one general comment. In the statement of considerations, and elsewhere, the proposed guide expresses the necessity of the use of judgement in the application of the criteria and the impossibility of exact calculation. Nevertheless, however, language is used which appears to set definite limits. For example, in 100.11(a)(3) "...at least 1-1/3 times...", we believe there are facilities already licensed which may not meet these arbitrary minimums, although full consideration of all the related factors would undoubtedly confirm the initial judgement that they are safe. In view of the internal [illegible] and potential controversy surrounding the interpretation of these guides, it seems to us that the inclusion of these minimums may cause difficulties to both the operating and the Commission.

Yours very truly

Earl Ewald

Earl Ewald
Vice President in Charge of Operation

EE
cc: R. S. King
Richard Hill

A1254