

PENNSYLVANIA POWER & LIGHT COMPANY

NINTH AND HAMILTON STREETS, ALLENTOWN, PA. TELEPHONE: HEmlock 4-5151

JACK K. BUSBY  
President

May 5, 1961

Secretary  
U. S. Atomic Energy Commission  
Washington 25, D.C.

Att: Director, Division of Licensing and Regulation

Dear Sir:

This letter is in response to the Commission's request for comments concerning a proposed regulation on site criteria for power and test reactors, as published in the Federal Register on February 11, 1961.

We believe that the guides outlined in the proposed criteria are most desirable for preliminary evaluation of potential reactor sites. We do not feel, however, that Appendix "A" contributes to the clarification of the criteria outlined in the regulation, and we recommend that it be eliminated. While this Appendix is described as an example of a calculation for preliminary guidance, it creates an opportunity for public misunderstanding of the intended flexibility of the criteria. Moreover, through interpretive actions, the Appendix and the Table of Exclusion distances may gradually assume regulatory status, especially if it is issued as a regulation and not as a guide. The many assumptions used in the example are ultraconservative, with the result that the calculated exclusion distances can be unreasonable for a specific site and for a specific reactor type and, therefore, are not typical or average values.

If Appendix "A" is retained as a part of the regulation, we believe that the various assumptions should be stated as a range of values rather than as specific quantities. This will permit use of the calculation methods proposed by the AEC without the restrictions imposed by conditions assumed in the Appendix which, in many cases, are not realistic.

Very truly yours,

*Jack K. Busby*  
Jack K. Busby

*A1255*