

NIAGARA MOHAWK POWER CORPORATION

NIAGARA  MOHAWK

300 ERIE BOULEVARD WEST
SYRACUSE 2, N. Y.

June 2, 1961

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

Attention: Director, Division of Licensing and Regulation

Gentlemen:

Subject: Reactor Site Criteria: Notice of Proposed Guides
10 CFR Part 100
Atomic Energy Commission

We have reviewed the above proposed Guides for reactor site criteria upon which you requested suggestions and comments. Accordingly, we offer for your consideration the following:

The Guide has been useful to us in connection with preliminary site analysis studies made by us.

We are in agreement that the siting requirements of each nuclear plant should, as stated in the Guide, be determined, among other considerations, on the merits of its particular design, including the specific meteorological conditions of the particular site. We believe the Guide, as it now stands, accomplishes to a large degree, its intended purpose in that it identifies in a reasonable manner certain of the major siting factors which must be considered during

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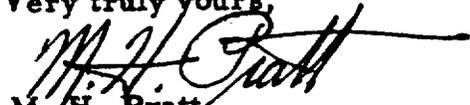
these early stages of reactor development. As experience is obtained on nuclear plant operation, more quantitative data will become available. A regulatory Guide of this nature can, therefore, in this respect, become quickly obsolete by the rapid advancement of the art. In order to prevent the continued usefulness of this Guide from being affected adversely as time goes on, it is assumed that the Guide will be updated periodically to alleviate, as warranted, the obvious economic disadvantages encountered in locating nuclear plants away from load centers.

We were surprised in some degree to learn from articles in the trade press and various other industrial sources of the general confusion in regard to the intended application of the appendix attached to the Guide. Because of this misunderstanding, it would perhaps be helpful if it could be even more clearly emphasized that the calculation given in the appendix is presented only as an example and would not apply to any specific actual plant site. We would suggest that it might possibly be helpful in making this point a little clearer if some of the factors affecting a specific site which should be evaluated and considered, but which are not included in the assumed figures of the example or presently stated in the Guide, were added to the siting factors outlined in the Guide itself. What we are suggesting is that the Guide should include as other important siting factors in addition to those now mentioned the necessity of considering and evaluating wind diversity, forced and natural cooling, etc.

It might perhaps also be well to include the fact that the manner of operation of a plant could be a factor in determination of the site suitability.

We appreciate the opportunity you have given us to comment on these proposed Guides and hope that you will find our comments of some value.

Very truly yours,



M. H. Pratt
Vice President and
Chief Engineer

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