PENNSYLVANIA ELECTRIC COMPANY

JOHNSTOWN, PENNSYLVANIA

LOUIS H. RODDIS, JR.
PRESIDENT

June 15, 1961

Mr. Robert L. Lowenstein, Acting Director
Division of Licensing and Regulation
U. S. Atomic Energy Commission
Washington 25, D. C.

Dear Bob:

This letter is being written in response to your invitation to comment on the proposed reactor site criteria regulation, 10 CFR - Part 100, that was published as proposed guides in the Federal Register, February 11, 1961.

While I feel that there is a need for a reactor site criteria regulation, I am of the opinion that the proposed regulation is too restrictive and places too much emphasis on distance and does not give sufficient credit to engineering design features that will contribute to reactor safety. As one who had something to do with the original introduction of the idea of containment as a substitute for distance, I feel particularly that a criteria should much more clearly recognize the part engineering design plays. It seems to me that it is unwise to make this reactor site criteria regulation too definitive since each reactor site and each different type of reactor should be evaluated separately on the basis of the site characteristics and reactor concept and design features.

If the regulation is too restrictive in establishing distances that reactors can be located from populated areas, it could seriously impede the development of nuclear energy for commercial power production. While the proposed regulation takes into consideration population density, no provision is made for the future development of areas and increases in population. I understand that the proposed regulation contemplated some population increase during the life of a plant. If this is so, it should be clearly stated.

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While it is intended that the hypothetical reactor calculation given in Appendix "A" of this proposed regulation be used as a guide and is a point of departure for consideration of a particular site and type of reactor, it seems to me that there is some danger that the distance derived from this example may be interpreted by the public as applying to all reactors. I, therefore, propose that this sample calculation be daleted from the regulation or that at least three sample calculations be prepared for different types of reactors and sites having widely different characteristics.

I appreciate the difficulty in developing this particular regulation and hope that the above comments may be of some help in the preparation of the final draft of this regulation.

Sincerely yours,

Louis H. Roddis, Jr.

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