

April 14, 2000

Mr. David Modeen
Director of Engineering
Nuclear Energy Institute
1776 I Street NW, Suite 400
Washington, DC 20006-3708

SUBJECT: DRAFT REPORT, "REGULATORY EFFECTIVENESS OF THE STATION
BLACKOUT RULE"

Dear Mr. Modeen:

Enclosed for your review and comment is a copy of draft report, "Regulatory Effectiveness of the Station Blackout Rule," prepared by the Regulatory Effectiveness Assessment and Human Factors Branch of the Office of Nuclear Regulatory Research (RES). In accordance with our "peer review" process prior to finalizing and distributing the report, we wish to provide you with the opportunity to comment regarding (1) the reasonableness of the approach, (2) the appropriateness of the conclusion, (3) and other regulations, accompanying regulatory guides and inspection documents that should be assessed to make U.S. Nuclear Regulatory Commission (NRC) activities more effective, efficient, and realistic.

RES is reviewing selected regulations, starting with the station blackout (SBO) rule, to determine if the requirements are achieving the desired outcomes and if the costs were reasonable considering the outcome. This initiative is part of an evolving program to make NRC activities and decisions more effective, efficient, and realistic. This report is an evaluation of the effectiveness of the SBO rule based on a comparison of the regulatory expectations to the outcomes. A set of baseline expectations was established from the SBO rule and related regulatory documents in the areas of coping capability, risk reduction, emergency diesel generator reliability and unavailability levels, and value-impact. The report concludes that although there are opportunities to improve the clarity of SBO regulatory documents, the SBO rule was effective and the industry and the NRC costs to implement the SBO rule were reasonable considering the outcome.

We welcome your comments. To meet our planned issuance schedule, we would appreciate receiving your comments within 60 days from receipt of this letter.

As you may know, RES reports do not represent official NRC positions. Our reports are one input to an ongoing review and evaluation process.

D. Modeen

-2-

A copy of this draft report and letter are being placed in the Public Document Room at 2120 L Street NW, Washington DC 20555.

If you have any questions regarding this report, please feel free to contact William S. Raughley, E-mail: WSR@NRC.GOV, (301) 415-7577.

Sincerely,

/RA/

Charles E. Rossi, Director
Division of Systems Analysis and Regulatory Effectiveness
Office of Nuclear Regulatory Research

Enclosure: As stated

D. Modeen

A copy of this draft report and letter are being placed in the Public Document Room at 2120 L Street NW, Washington DC 20555.

If you have any questions regarding this report, please feel free to contact William S. Raughley, E-mail: WSR@NRC.GOV, (301) 415-7577.

Sincerely,

/RA/

Charles E. Rossi, Director
Division of Systems Analysis and Regulatory Effectiveness
Office of Nuclear Regulatory Research

Enclosure: As stated

Identical letters sent to: See attached list

Distribution w/encl.:

Public
File Center
REAHFB R/F
DSARE R/F
CPaperiello, DEDMRS
AThadani, RES
MFederline, RES
TKing, RES
PNorian, RES
SRubin, RES
DMathews, NRR
BSheron, NRR

C:\external-cover.wpd

DRAFT REPORT – ACCESSION NUMBER ML003706016
DRAFT APPENDICES – ACCESSION NUMBER ML003706889

*See previous concurrence

To receive a copy of this document, indicate in the box: "C" = Copy without attachment/enclosure "E" = Copy with attachment/enclosure
"N" = No copy

OFFICE	REAHFB	E	REAHFB	E	C:REAHFB	E	D:DSARE	
NAME	WRaughley:mmk:mt b		NPKadambi		JRosenthal		CRossi	
DATE	04/03/00*		04/04/00*		04/04/00*		04/14/00*	

OFFICIAL RECORD COPY

Template= RES-006 Accession Number ML003706056 RES File Code RES-7A-1

SUBJECT: REGULATORY EFFECTIVENESS OF THE STATION BLACKOUT RULE

Identical letters sent to:

David A. Lochbaum
Union of Concerned Scientists
1616 P Street NW, Suite 310
Washington, D.C. 20036-1495

Mr. William J. Hastie
Institute of Nuclear Power Operations
700 Galleria Parkway
Atlanta, GA 30339-5957

Mr. Raymond C. Torok, Project Manager
Nuclear Power Group
Electric Power Research Institute
P.O. Box 10412
Palo Alto, CA 94303

Mr. Gary L. Vine
Senior Washington Representative
Electric Power Research Institute
2000 L Street NW, Suite 805
Washington, DC 20036

Mr. Louis Liberatori, Chairman
Westinghouse Owners Group
Consolidated Edison Co. of New York, Inc.
Indian Point Nuclear Station
Broadway and Bleakley Avenues
Buchanan, NY 10511-1099

Mr. Ralph Phelps, Chairman
ABB-CE Owners Group
Omaha Public Power District
Ft. Calhoun Nuclear Station
P.O. Box 399
Ft. Calhoun, NE 68023-0399

Mr. W. Glenn Warren, Chairman
BWR Owners Group
Southern Nuclear Operating Company
Mail Code B052
40 Iverness Center Parkway
Birmingham, AL 35201

Mr. Frank L. Swanger, Chairman
B&W Owners Group
Toledo Edison Company
Davis Besse Nuclear Power Station
Mail Stop 3105
5501 North State Route #2
Oak Harbor, OH 43449

Mr. James Riccio
Critical Mass Energy Project
Public Citizen
215 Pennsylvania Ave. SE
Washington, DC 20003