

June 9, 2000

Ms. Michele Riddell
Safe Legacy
173 Huguenot Street
New Paltz, NY 12561

Dear Ms. Riddell:

I am responding to your e-mail of April 7, 2000, to Chairman Meserve of the U. S. Nuclear Regulatory Commission (NRC). In your e-mail, you expressed your concerns with our use of probabilistic risk assessment (PRA) techniques to justify the safety of existing spent fuel pool designs.

As you stated, Dr. Hanauer was a respected technical advisor. However, in the two and a half decades since the statement you quoted ("you can make probabilistic numbers prove anything, by which I mean, that probabilistic numbers 'prove' nothing"), there have been significant advances in risk assessment methodologies. In that time frame, the NRC has also gained a great deal of experience in applying these methodologies to the regulatory arena, which has led to improved safety. The NRC has determined that PRA is an acceptable technology and uses it in a manner that complements a deterministic approach and supports the traditional defense-in-depth philosophy.

Your specific comments will be addressed in our evaluation of public comments associated with the Draft Final Technical Study of Spent Fuel Pool Accident Risk at Decommissioning Nuclear Power Plants. We will send you a copy of this document, which will include the resolution of public comments, when it is issued. The current schedule is to issue the study in August 2000.

Thank you for informing us of your concerns. I trust this has been responsive to them. Should you have any additional questions, or if I can be of further assistance in this matter, please contact David Wrona of my staff at 1-800-368-5642.

Sincerely,

/RA/

John A. Zwolinski, Director
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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