



**Institute of
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July 14, 2000

Dr. Farouk Eltawila
Acting Division Director
Division of Systems Analysis and Regulatory Effectiveness
U.S. Nuclear Regulatory Commission
Mail Stop T10E32
Office of Nuclear Regulatory Research
Washington, DC 20555-0001

Dear Dr. Eltawila:

Subject: Draft Report, "Regulatory Effectiveness of the Station Blackout Rule"

Thank you for the opportunity to review and comment on the subject report. The approach and conclusion of the report appear reasonable. The following comments are provided to help improve the information that supports the conclusion.

- We recommend that the specific core damage frequency (CDF) numbers contained in the report be removed since they are characterized as approximations. It would be sufficient to say reductions in CDF are supported by the results of CDF calculations.
- The conclusion that the value impact was within the expected range of reductions in public dose-per dollar of cost is not well supported. The justifying statement, "However, it appears licensees justified the cost of the power supplies by counting on offsetting monetary benefits from increased EDG allowed outage times", is not supported by any monetary cost/value data.
- The opportunities identified to improve regulatory documents do not support the main conclusion of the report. For example, the report concludes that emergency diesel generator (EDG) reliability has improved.

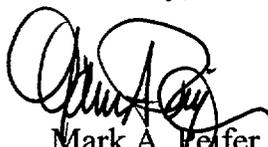
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However, the report also suggests that NRC test and inspection documents have not focused sufficiently on the dominant contributors to EDG unreliability during actual demands. Justification should be provided on why the identified opportunities do not affect the main conclusion of the report.

Please call Jim Lynch, manager, Events Analysis Department, at (770) 644-8671 or me at (770) 644-8212 if you have any questions regarding our comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mark A. Peifer', written over a circular stamp or seal.

Mark A. Peifer
Vice President

Industry and Government Relations Division

ACT:cen

cc: Mr. William S. Raughley
Mr. A. C. Tollison, Jr.
Mr. Gary Fader