

IN RESPONSE, PLEASE
REFER TO: M930803A

August 12, 1993

MEMORANDUM TO: James M. Taylor
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary /s/

SUBJECT: STAFF REQUIREMENTS - BRIEFING ON STATUS OF
PART 100 RULE CHANGE AND PROPOSED UPDATE ON
SOURCE TERM AND RELATED ISSUES, 10:00 A.M.,
TUESDAY, AUGUST 3, 1993, COMMISSIONERS'
CONFERENCE ROOM, ONE WHITE FLINT NORTH,
ROCKVILLE, MARYLAND (OPEN TO PUBLIC
ATTENDANCE)

The Commission was briefed by the NRC staff on the status of the rule change to 10 CFR Part 100, the proposed update to the accident source term, and some related issues. The Commission raised several concerns regarding the prescriptive aspects of the proposed revisions to Part 100 as well as the form and content of the proposed rule issued for comment. In order to address these concerns, the Commission requested that further staff considerations for proposed revisions to Part 100 and the proposed update of the source term specifically address the following issues:

1. the extent to which the source term can be decoupled from the siting criteria in view of technological advancements,
2. the technical and safety-related basis for siting criteria as opposed to what the U.S. can accommodate,
3. the extent to which proposed reactor site criteria reflect concerns of potential users in other countries,
4. the pros and cons of less prescriptive revisions to Part 100 than those issued for public comment,
5. the extent to which the reactor siting criteria conform to stated risk objectives, such as the Safety Goal, and the extent to which emphasis should be given to less quantifiable objectives such as defense-in-depth or prudence,
6. the appropriate balance between deterministic and

probabilistic seismic evaluations,

7. the extent to which timing of proposed revisions are being driven by the prospects of an early site permit,
8. the extent to which proposed revisions support the Commission policy of consistent and predictable practice (e.g., the issue of assurance versus flexibility afforded by the proposed revisions),
9. plans to ensure that there is feedback between the source term development effort and the severe accident rulemaking process.

(EDO)

(SECY Suspense: 11/19/93)

The idea of an international workshop or other appropriate forum for international interaction on these issues may also be worthy of consideration.

cc: The Chairman
Commissioner Rogers
Commissioner Remick
Commissioner de Planque
OGC
OCA
OIG
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)
PDR - Advance
DCS - P1-24