

OPTIONS

- A. PERFORM EXTENSIVE EXPERIMENTAL PROGRAM (MULTI-YEAR) BEFORE CAN MAKE TECHNICALLY SOUND RECOMMENDATIONS
- B. ABANDON RULEMAKING. DISCOURAGE EP EXEMPTION REQUESTS. REVISIT PAST EP, SECURITY, AND INDEMNIFICATION EXEMPTIONS FOR DECOMMISSIONING PLANTS DUE TO HIGH UNCERTAINTY.
- C. CONVENE PANEL OF EXPERTS. ATTEMPT TO ADDRESS THERMAL HYDRAULIC UNCERTAINTIES THROUGH EXPERT ELICITATION PROCESS. SEE IF ORIGINAL THERMAL HYDRAULIC ASSUMPTIONS WERE REASONABLE AND CAN BE RE-ESTABLISHED.
- D. ABANDON LINKING OF LOW FREQUENCY OF ZIRCONIUM FIRE WITH LONG TIMES AVAILABLE FOR LOCAL EVACUATIONS. JUSTIFY EXEMPTION OF EP SOLELY ON FREQUENCY OF RISK.^{1 2}
- E. ADOPT A MULTI-FUNCTIONED "FIX" TO EACH INITIATOR TO WHITTLE AWAY AT CONCERNS.
 - I. ADD STAFF SDA ON BUILDING AIR FLOW FOLLOWING A SEISMIC EVENT OR LOSS OF OFFSITE POWER.
 - II. ASSURE 3 X SSE WILL NOT CAUSE DEBRIS COVER OF SFP
 - III. NATIONAL GUARD SUPPORT
 - IV. 4-WHEEL DRIVE VEHICLES
 - V. PORTABLE RADIOS IN 2-MILE RADIUS
 - VI. NRC INSPECTOR ON-SITE DURING HEAVY LOAD MOVEMENTS

¹ In the past the EP people have indicated this approach was unacceptable.

² The frequency of the dominant sequence (seismic) at about 4.5×10^{-6} per year is in the area of increased management attention, based on Regulatory Guide 1.174 guidance. This level of risk clearly is not below regulatory concern.

B-180