R Barrett 11/21/99
me

hydrides
radiation

See wisdom in this, but industry proposed mitigation device in radiation environment. Want it to not be excluded.

Why add outside injection if LERF w/or w/o

recognize ACRS motivation - Tech argument that recognizes low prob of recovery once uncover fuel

~~But~~ consider injection

Conservative - { ① w/ right equip may be recoverable
② industry committing to it

~~Don't believe~~ believe in conseq space

~~Use~~
~~unsat~~

prudent strategy for prelim anyl
but for rule making, credit given for features such as remote injection; in addition staff has not yet fully analyzed the Δ in conseq assoc in LERF vs Zr fire are = or ≠.
conseq of Zr fire ≡ LERF?

approximate credit for that option.
Should use less conservative criterion

B/219

uncertainties
prudency
equivalency of risk

risk-informed assessment of Zr fires requires realistic assessment of conseq. Staff hasn't concluded that conseq Zr fire ≡ LERF.