

From: George Hubbard *NRR*
To: Charles Tinkler, Diane Jackson, Gareth Parry, G...
Date: Mon, Apr 17, 2000 2:15 PM
Subject: Revised ACRS Letter to the Chairman on TWG Report

DUE DATE TO DIANE IS APRIL 25

I have put the major comments into the following categories:

1. Consequences and plume related matters including land contamination
2. Thermal Hydraulic concerns relative to zirc fires
3. Proposed acceptance criteria (LERF for operating reactors)
4. Seismic too conservative
5. Uncertainties in dominating sequences involving human errors and seismic events

In response to the Green Ticket (G20000194 - TAC MA8648A) we have received on this and based on discussion with John Hannon, I propose the following approach for a letter back to the ACRS in which we broadly address their concerns. **PLEASE CHARGE ANY TIME TO THE ABOVE TAC NUMBER**

1. Thank them for the input.
2. Acknowledge concerns on consequences and plume. - Jason/Tinkler/Cheok/Kelly
Tell them we have done work on ruthenium and will include in report
Acknowledge other work going on by RES and international community
3. Acknowledge concerns on thermal hydraulic concerns - Joe Staudenmeier
Tell them what additional work we have done - partial drain down work - and that we will be including it in the final version
4. Address broadly their concerns on uncertainties - Gareth/Cheok/Kelly
Tell them we will add additional information in final report - only if we think it is necessary.

Acknowledge the fact that further work in the areas of consequences and T/H could be useful in the future; however, with the low frequency of fuel uncoverly we calculated and the fact that no credit is taken for mitigative actions once fuel uncoverly occurs we believe the need for the recommended work is not justified for continuation of rulemaking activities for decommissioning plants since the frequency of reaching the end states where this data would be needed would be lower frequency than the values calculated in this report. Bring in the fact that seismic events are dominating and since, as acknowledge by the ACRS, we were conservative in our seismic efforts the frequency of fuel uncoverly would be further reduced if realistic analysis were used. Somehow we need to bring in the fact that the proposed acceptance criteria is good enough - suggestions on how to do this are welcomed.

This is my first cut approach to doing this, let me know your thoughts. I'm asking Diane to draft up a first cut- please provide your input to Diane.

OUR RESPONSE IS DUE TO TIM/GARY ON MAY 1. IN ORDER TO GET REVIEW BY THE BRANCH CHIEFS HAVE YOUR INPUT TO DIANE BY APRIL 25.

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THANKS,

George Hubbard
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CC: Goutam Bagchi, Jared Wermiel, John Hannon, Mark...