

**From:** Robert Palla / RRP  
**To:** David Diec  
**Date:** 12/4/00 4:01PM  
**Subject:** Insert to staff response to ACRS

see attached. This covers the item re: providing additional risk measures in the report. Comments and suggestions appreciated (markups appreciated even more).

**CC:** Jason Schaperow

I/2

Insert to staff response to November 8, 2000 ACRS letter:

The ACRS recommended that the final report include all of the projected consequences calculated by MACCS (e.g., latent cancer fatalities and land contamination) to provide input to decisions concerning insurance and safety at decommissioning plants. We agree that regulatory decisions related to spent fuel pools (SFPs) should not be based solely on individual risk of prompt fatalities and the individual cancer risk, and that other risk measures as suggested by the Committee should also be considered in revising regulatory requirements for decommissioning plants. We believe that sufficient information is contained in the final technical report to support regulatory decisions regarding changes to insurance coverage requirements for decommissioning plants. Specifically, the final report concludes that the probability of a SFP fire, while substantially less than a severe reactor accident, cannot be precluded, and that the consequences of a SFP fire can be comparable to those for a severe reactor accident. The probabilistic analysis and results of extensive consequence calculations (including latent cancer fatalities) are included in the appendices to the main report. Land contamination and economic costs, although not explicitly reported, would also be comparable to that for a severe reactor accident, and are available from the archived MACCS output if they are later found to be necessary to support rulemaking.