

**From:** Diane Jackson *NRA*  
**To:** Brian Sheron, Gary Holahan, Jared Wermiel, John... *NRA*  
**Date:** Mon, Nov 8, 1999 9:22 AM  
**Subject:** ACRS letter to Commission on TWG

I reviewed a draft of the ACRS letter to the Commission (I was reminded by the ACRS staffer that since it is draft, the letter is subject to change). The final will not be ready for a few days.

The ACRS had four main points on the TWG's SFP accident risk project:

1. They agree with our general approach to determine the critical decay time that a zirconium fire is possible. Uncertainty analyses for oxidation kinetics and heat rejection mechanisms are needed. However, they believe we would need to use conservative choices in our analyses or have additional experimental research performed to do so.
2. The PRA should be as realistic as possible. They agree with our approach to solicit expert feedback on human reliability.
3. They agree with our end state of fuel uncovering (rather than zirconium fire as suggested by NEI) based on health consequences and uncertainties in fuel damage behavior, fission product release, and air-oxidation kinetics of high burnup fuel. They recommend the LERF criterion in RG 1.174 be used.
4. They support our approach/ work to set a critical temperature for the onset of runaway oxidation. They believe uncertainties in the analysis should be quantified.

They closed the letter saying that this may be a possible candidate for the rationalist regulatory approach, as described in their May 19, 1999, report.

Diane

**CC:** GTH, Mark Satorius

*0/1/16*