

From: Glenn Kelly *NRR*
To: George Hubbard *NRR*
Date: Wed, Mar 22, 2000 3:53 PM
Subject: UCS comments on draft final Decomm Risk Assessment

Mr. Lochbaum is correct in his criticism that we did not DIRECTLY address his concerns about worker safety from severe accident issues or from design bases issues such as resin tank fires. On pages 40, 43, 44, 46, 91, 92, 93, 95, 96, 410, and 411 of the July 15-16, 1999, Reactor Decommissioning Workshop transcript, the staff (mostly Gary H.) discussed Mr. Lochbaum's issue and indicated we would address the issue in our draft final report.

1. The concerns about fire fighters or plant staff being subject to a "bad" environment when the pool inventory is lost is dealt with in the draft final report by the industry commitments and the staff's additional requirements that help assure that the risk numbers come out ok. Basically, without directly addressing Lochbaum's issue, we answered the severe accident part by saying we are going to prevent the accident from ever happening by the enumerated means. We will directly address Mr. Lochbaum's severe accident concerns in the final report. You may wish to let him know that we will do so.

2. The concerns about design bases events (such as resin fires) were not addressed in the draft final report and should be addressed in some manner, as was promised to Mr. Lochbaum. Discussions with Mark Rubin suggest that these discussions are your bailiwick.

CC: Mark Rubin

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