

From: Gilbert Millman ^{EDO}
To: Mark Satorius, Michael Tschiltz, ^{EDO}OCM
Date: Tue, Apr 11, 2000 8:05 AM
Subject: Draft Recommendations from ACRS

Attached are recommendations which ACRS will likely issue today. I obtained them from a review of their draft reports. I plan to e-mail a summary of these recommendations following notification of the EDO at the morning meeting. Gil

RH

**Draft ACRS Recommendations
Meetings Held Week of April 3, 2000**

1. Draft Final Technical Study of Spent Fuel Accident Risk at Decommissioning Nuclear Power Plants

- a. The integrated rulemaking on decommissioning should be put on hold until the staff provides technical justification for their proposed acceptance criterion for fuel uncover frequency. In particular, they need to incorporate the effects of enhanced release of ruthenium under air-oxidation conditions and the impact of the MACCS code assumptions on plume related parameters in view of the results of a recent expert elicitation.
- b. The technical basis underlying the zirconium-air interactions and the criteria for ignition need to be strengthened. In particular, the potential impact of zirconium-hydrides in high burnup fuel and the susceptibility of the clad to break-away oxidation need to be addressed.
- c. Uncertainties in the risk-assessment need to be quantified and made part of the decision-making process.

2. Reactor Safety Goal Policy Statement

An entirely new policy statement on risk-informed regulation should be developed that would include:

- a. The concept of risk limits for individual plant applications.
- b. Consideration of a "three region approach" that defines CDF and LERF boundaries that would be consistent with "adequate protection" and that would define "how safe is safe enough."
- c. Guidance on "defense-in-depth" to address uncertainties in the risk assessment.