

May 29, 1959

MEMORANDUM

To: Members of the ACRS
From: C. Rogers McCullough, Chairman
Subject: TENTATIVE FIRST DRAFT REVISION OF PART 50 REGULATIONS

During the early part of October 1958 copies of the tentative first draft revision of the Part 50 Regulations dealing with the procedures for facility licensing and the contents of hazards reports were sent to each member. Mr. Price asked for any comments which the Committee might care to make about this draft. In the rush of other business the Committee has never gotten around to discussing this draft in order to formulate comments.

On May 11, Mr. Price acknowledged receipt of a suggested regulation requiring review of proposed reactor sites. This item was in the members' folders for the April meeting. In this same letter he suggested that he would like to have the Committee's comments on the draft revision of the Part 50 Regulations.

On May 27, Jim Graham sent all Committee members a copy of Title 10 - Atomic Energy, Chapter I - Notice of Proposed Rule Making for Site Criteria, published in the Federal Register on May 23, 1959. It is suggested that we plan to discuss with Mr. Price the revision of Part 50, as well as this Proposed Site Criteria, and any comments which he may have received at the July 1959 meeting.

To assist the Committee members in reviewing the Part 50 Regulations, it is suggested that the members look at the following:

Pages 1 and 2 - Note the inference that they believe it desirable to get a final acceptance of a site at the construction permit stage and perhaps even earlier.

Page 4 - Note on third line from the bottom that they speak of the safety margin of the of the site proposed. I am not aware of any definition of safety margin.

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Pages 6 and 7 - Note that the concept of design criteria and maximum credible accident is contained in the writing.

Appendix A - This requires considerable thought. I wonder why site information is needed to a distance of one mile for reactors less than 100 watts. The other provisions of Appendix A are also of interest.

Appendix B - It seems to me that paragraph "c" contradicts paragraph "b".

On page 12, Appendix B, the concept of the maximum credible accident is again introduced.

It should also be noticed that the list of items under "B - Reactor Design" (page 5), is quite detailed. There is a resemblance of this list to the list which I prepared for Dresden entitled, "Philosophy of ACRS Review of the Dresden Nuclear Power Plant", which was distributed at the March meeting. The pitfall of such long detailed lists is that without very intensive study these lists can omit essential features and their very length implies that they are complete. Although I believe that there should be a continuing effort to write a complete list, there must always be the reservation that the list is not necessarily complete. Accordingly, I believe it might be better to insist that the applicant supply detailed information on the parts of the plant which are pertinent to the accident possibilities and leave it to his judgment as to the detail into which he goes.

At the request of the General Manager I will meet with the Commission on June 9 to discuss the "Status of Criteria for Reactor Safety". Jim Graham and I are currently working on an outline for this discussion. Any suggestions which the Committee members may have will be greatly appreciated. We will, of course, send out to all Committee members a copy of anything which we get written on this subject.

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