

From: Steven Long *NRL*
To: Dave Lochbaum *VCS*
Date: 6/25/02 7:35AM
Subject: Re: What Green?

Dave,

Thank you for sending me a copy of your latest thought about what needs to be included in the NRC's risk assessment for the Davis Besse head cavity. Your previous inputs have been getting to me, but not by a well-defined process that I feel I can count on to be prompt. Getting a copy directly is helpful.

As the analyst responsible for producing the risk assessment for the cavity, I'm going to have to take some offense at our statement that it's a sham. I'm doing my best to make it a realistic assessment, which is why nothing is out, yet. As you observed, there are a lot of people (inside and outside the NRC) who have decided what "color" they want, and the ones that don't see their preferred color will fight over the analysis. That is to be expected in any regulatory process where the outcome of the analysis has serious repercussions for the regulated entity. My goal is to provide an analysis that is objective and defensible, and then deal openly with the arguments from the parties for another color.

Using PRA in this context is a difficult task. The models were not designed for it, and the time available is too short if there is any unknown phenomenon involved. In addition, there are always some outstanding technical issues that may affect the model's results, once those issues are resolved. There will always be some judgement involved in dealing with unresolved issues on a tight schedule.

I hope that you will look at my analysis objectively when I make it available, and give me some feed-back in a constructive manner. Please recognize that I am not able to revise the Reactor Oversight Significance Determination Process as I do the analysis. The Lessons Learned Task Force is an appropriate venue for discussing needs for process changes. I will be suggesting some to them, and I expect you will, too.

Steve

>>> "Dave Lochbaum" <dlochbaum@ucsusa.org> 06/24/02 08:54AM >>>
Hello Steve

VCS

Attached is a copy of a letter submitted to Jack Grobe in Region III this morning.

It involves allegations that the inventory of TSP inside containment at Davis-Besse could not have adequately neutralized all the boric acid leaked into containment over the years and all the boric acid dumped into containment during an accident. Thus, the pH level in the containment sump would not have been properly neutralized.

It is another example of my concern with the PRA being done to select a color. The models simply do not fit the reality of the situation. Thus, the output of unrealistic models is irrelevant.

The NRC has a gut feeling for what it wants the final color to be and will tweak the model until it cranks out that color. It's a sham.

Thanks,
Dave

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