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## NUCLEAR REGULATORY COMMISSION

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1	UNITED STATES OF AMERICA
2	NUCLEAR REGULATORY COMMISSION
3	+ + + + +
4	ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
5	502nd MEETING
6	+ + + + +
7	FRIDAY
8	MAY 9, 2003
9	+ + + +
10	ROCKVILLE, MARYLAND
11	+ + + +
12	The meeting was held in Room T2B4, Two
13	White Fling North, Rockville, Maryland, at 8:30 a.m.,
14	Mario V. Bonaca, Chairman, presiding.
15	PRESENT:
16	MARIO V. BONACA, ACRS Chairman
17	GRAHAM B. WALLIS, ACRS Vice Chairman
18	GEORGE E. APOSTOLAKIS, ACRS Member
19	F. PETER FORD, ACRS Member
20	GRAHAM M. LEITCH, ACRS Member
21	DANA A. POWERS, ACRS Member
22	VICTOR H. RANSOM, ACRS Member-at-Large
23	THOMAS S. KRESS, ACRS
24	WILLIAM J. SHACK, ACRS
25	JOHN S. SIEBER, ACRS
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1	STAFF PRESENT:	
2	JOHN LARKINS, Executive Director	
3	SAM DURAISWAMI, ACRS/ACNW	
4	SHER BAHADUR, ACRS/ACNW	
5	HOWARD J. LARSON, Special Assistant,	
6	ACRS/ACNW	
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1	PROCEEDINGS
2	(8:33 a.m.)
3	CHAIRMAN BONACA: Good morning. The
4	meeting will now come to order.
5	This is the second day of the 502nd
6	meeting of the Advisory Committee on Reactor
7	Safeguards. During today's meeting, the committee
8	will consider the following:
9	Subcommittee report on the revised
10	application for the mixed oxide fuel fabrication
11	facility;
12	Subcommittee report on the integrated
13	industry initiating event of former syndicator;
14	Future ACRS activities;
15	Report of the Planning and Procedures
16	Subcommittee;
17	Reconciliation of ACRS comments and
18	recommendations;
19	And proposed ACRS reports.
20	This meeting is being conducted in
21	accordance with the provisions of the Federal Advisory
22	Committee Act. Mr. Sam Duraiswami is the designated
23	federal official for the initial portion of the
24	meeting.
25	We have received no written comments or
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1	requests for time to make oral statements from members
2	of the public regarding today's sessions.
3	A transcript of portions of the meeting is
4	being kept, and it is requested that speakers use one
5	of the microphones, identify themselves, and speak
6	with sufficient clarity and volume so that they can be
7	readily heard.
8	Before we proceed, I would like to
9	announce that Barbara Whitaker, who has been with us
10	for the past three years, is leaving the ACRS to join
11	RES on June 1st, 2003.
12	Where is Barbara?
13	PARTICIPANTS: She's not here.
14	CHAIRMAN BONACA: She's not here.
15	Well, we would like certainly to thank her
16	for her outstanding administrative support to the ACRS
17	and wish her good luck, and we hope you have an
18	opportunity to go by her desk and let her know because
19	she's not here right now.
20	MEMBER POWERS: Slaving away for us right
21	now.
22	CHAIRMAN BONACA: Slaving away for us.
23	With that I'll move to Dana who is going
24	to give us a summary report on the revised application
25	for the mixed oxide fuel fabrication facility.
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MEMBER POWERS: I didn't know we were going to be on the record for this. We're not quite prepared for that, but we can do that because we've got all kinds of support crew here to see how well I learned the lessons from all of these subcommittee meetings we've had.

7 What I wanted to try to accomplish today was to brief the committee a little bit on where we 8 9 stand on this particular review of the MOX facility, 10 MOX fuel fabrication facility, and remind you that this is one of those activities the Commission has 11 12 specifically asked us to take a look at and address 13 for them, and it's a little bit different world than 14 what we're used to working in. This is definitely not 15 a power reactor.

A different set of regulations apply to 16 17 There's a different set of terminologies that it. apply to it, altogether a different world, and what 18 19 I'll try to do is give you a brief synopsis of this 20 world, try to direct you to the right parts of the 21 Code of Federal Regulations for looking at things, and 22 give you a status on how we're going to proceed with 23 this.

24 You'll recall we're on a pretty good pace 25 to get everything done about a year, two years ago

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almost, and then there was some change in the mission 1 that, quite frankly, was probably horribly time 2 consuming for the folks at DCS to make the changes, 3 but it wasn't a very big perturbation in the facility 4 from a safety perspective. So a lot of our past work 5 6 stands in good stead for that. 7 So right now I see us moving on at a 8 pretty expeditious clip on the whole thing. 9 Well, this says the mixed oxide fuel fabrication facility. I think everybody understands 10 this is a facility for manufacturing mixed oxide fuel 11 for use in commercial nuclear reactors using weapons 12 grade plutonium. There is a health amount of 13 information in the world's literature on the use of 14 mixed oxide fuels in commercial nuclear power plants. 15 That experience, however, is largely with 16 what you would call reactor grade plutonium, and this 17 is going to use weapons grade plutonium. How big the 18 perturbation is is a lot in the eyes of the beholder, 19 20 but it's clear that it's a perturbation. That part of this activity, using the fuel 21 in the reactor, is not part of this review. We're 22 only looking at the fabrication of the fuel itself. 23 MEMBER KRESS: Where does Mileadadum 24 25 trifuoride enter the picture? **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1	MEMBER POWERS: Well, I have no idea why
2	you ask the question, Dr. Kress, because there is no
3	Mileadadum indicated up there. The Mileadadum symbol
4	is MO. M is well known to stand for mixed oxide.
5	MEMBER KRESS: Oh. My mistake.
6	(Laughter.)
7	MEMBER POWERS: The facility that they're
8	setting up has additional peculiarity that they're not
9	going to be terribly used to, is that it is located on
10	the Savannah River site, which is a DOE facility, and
11	it is a huge reservation.
12	There it is. Here's the site boundaries
13	out here. And I forget. It must be about five miles,
14	six miles between the facility and the site boundary,
15	and even when you get to the site boundary, you've got
16	a long ways to go before you hit civilization. Some
17	people say several states.
18	(Laughter.)
19	MEMBER RANSOM: Dana, where are the old
20	production reactors?
21	MEMBER POWERS: The Savannah River site.
22	(Laughter.)
23	MEMBER RANSOM: But you don't know where?
24	MEMBER SIEBER: From north to south it's
25	40 miles.
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It's fair sized MEMBER POWERS: а 1 There's a lot of agonizing over the fact 2 facility. that there's a public road that goes through there. 3 That's something that Savannah River has put up with 4 for years. They've got decent ways to deal with that 5 particular problem. 6

Locating things on the Savannah River site really gives you some interesting benefits. You've got a well developed structure for security certainly, a well developed structure for things like external fire department responding to an event at the facility.

the We'll discuss problem of 13 the collocated workers, which figures a lot in the debates 14 on this subject. I think it's a tempest in the teapot 15 because what you've got is a bunch of people on this 16 site unassociated with the facility, but they're 17 reasonably disciplined folks that are under reasonable 18 control. I mean, they're a lot easier to control than 19 a generalized public. 20

The facility also has this peculiarity that it's receiving a product from a DOE operation, regulated, patrolled, safety assessed by DOE. It goes into the mixed oxide fuel fabrication facility. The effluents from that facility go back into the DOE

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system and outside of NRC control. The product goes 1 2 off to commercial reactors, presumably Catawba and McGuire, and, no, Dr. Kress, I do not know why ice 3 4 condensers are peculiarly appropriate for mixed oxide 5 fuel, but that's not part of this review. 6 MEMBER KRESS: Okay. 7 MEMBER POWERS: And presumably the 8 irradiated product then comes back into the DOE 9 So this is going to be an island of NRC system. 10 regulation within the DOE site. It will be interesting to interview the people developing this 11 12 facility after a few years of operation to see whether 13 they prefer DOE oversight or NRC oversight. I will definitely place my bets on how 14 15 that outcome is. We have developed in this country a lot of 16 17 facilities for handling plutonium based fuels in this We haven't done any in the last 25 years, 18 country. 19 but the technology is reasonably established, and what 20 they are doing at this facility is that they are adapting, 21 borrowing, learning from modern more 22 facilities that have been set up in France. 23 It's not a copy of a facility in France, but you know, it has benefitted from their more recent 24 25 experience, but it's using relatively established NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1	technologies.
2	These are leaning forward in the trenches
3	in modernization of this, and the major elements, you
4	dissolve plutonium dioxide. You run a PUREX process.
5	Then you cinder up some powders, disburse that and
6	it's into $UO_2$ powders, make some fuel pellets, and put
7	it in fuel rods.
8	There is nothing in this that would not be
9	familiar to people that have been handling plutonium
10	in the past.
11	VICE CHAIRMAN WALLIS: This is like the
12	facility that we visited in France.
13	MEMBER POWERS: Very much like this, very,
14	very much like that.
15	For those of you who are not familiar with
16	the PUREX process, this is a solvent extraction type
17	of process where you're moving plutonium and uranium
18	from an aqueous phase into an organic phase, variously
19	known by names like what is it? normal
20	paraffinic hydrocarbon, but to anybody else is known
21	as kerosene.
22	A little more detail on the process here.
23	It just shows you that they like to divide it down
24	into what they call the AP and MP processes. AP
25	stands for aqueous polishing. MP, I can never
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241 remember what it stands for, but that results in your 1 2 making fuel rods. 3 Ι nothing think there's terribly surprising about what the facility looks like. What? 4 5 I think it's a three story building laid out with the 6 various areas defined. It operates with a relatively 7 conventional, multiple nested zone kind of 8 heating/ventilation system so that the leakage is all 9 inwards, fairly familiar technology. Because it's located in a site, you need 10 to stay aware of what boundaries are, and you have a 11 12 site boundary that's way the heck out, and these are the definitions for the boundaries that come out of 13 Part 20. 14 15 That boundary is really controlled by the 16 Savannah River site itself. Then you have controlled 17 areas and restricted areas. What these help you do is 18 define facility workers, what Ι like call to collocated workers. I think they use a different term 19 20 for it, but it means the same thing, and the public. 21 The public is outside the site boundary. The 22 facility workers are the guys obviously within the restricted area. In between you 23 have lots of people who are working on the Savannah 24 25 River site, and even people associated with the

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facility that don't ordinarily constitute radiation
workers.

That ha in the past always been a 3 Okay. subject of a large amount of debate. Why don't you 4 treat people on the site, but not associated with the 5 the public? It's extraordinarily 6 facility as 7 different to understand why the secretary working in the SRS building is any different than the secretary 8 9 working in a bank outside the site as far as her volunteering for radiation exposure. 10

Well, that debate has gone on, gee, as 11 12 long as I can remember, and I think they've come up with a reasonable compromise on this sort of thing. 13 They say, "Well, we'll just educate these people, and 14 they'll know what to do in the event of an emergency. 15 They'll be aware of what the facility context, and 16 they'll know what to do in case there's an accident. 17 And so we will treat them a little bit differently 18 19 than the public and clearly not call them facility 20 workers."

Okay. Well, things are different when you work with facilities. You're working with a different set of regulations. I'm going to focus just on the criteria that come out of 70.61. Here are the dose limits that you have. For workers we're trying to

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1	keep doses below 25 REM. The public, you want to keep
2	them below five REM.
3	MEMBER KRESS: I don't see a third
4	criteria for that group you just talked about.
5	MEMBER POWERS: Well, they become
6	MEMBER KRESS: Workers?
7	MEMBER POWERS: workers because they're
8	educated, right.
9	MEMBER KRESS: Okay They're included.
10	MEMBER POWERS: Well, they're different
11	things, and I don't want to go into all of the
12	subtleties on that.
13	I think the more limiting issue here is
14	really this criterion of 24 averaged releases off the
15	site of 5,000 times Table 2. Those of you that get to
16	work with Table 2, I don't need to explain to you what
17	it is.
18	Those of you that have never had the
19	pleasure of dealing with Table 2 and Appendix B of
20	Part 20 really ought to do it.
21	MEMBER APOSTOLAKIS: I thought we were
22	fortunate.
23	MEMBER POWERS: It's an experience that
24	will enlighten and educate you.
25	MEMBER APOSTOLAKIS: Okay.
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244 MEMBER POWERS: At this stage in the 1 2 process for the MOX facility, we're dealing with the 3 design basis. They're seeking a permit to qo 4 construct this facility, and the regulations specify what you're supposed to do, and you're supposed to 5 6 address all of these topics that I have listed down 7 here. I'm anxious for the committee to delve 8 9 deeply into the first one and explore all of its 10 nuances and ramifications in great depth. The subcommittee itself doesn't intend to. 11 12 More interesting than that list of --13 MEMBER APOSTOLAKIS: Dana, wasn't ThE PRA there on the list? I didn't -- or an ISA. 14 Is that 15 what they're doing? 16 (Laughter.) 17 MEMBER POWERS: GRA, George. 18 MEMBER APOSTOLAKIS: ISA. 19 MEMBER POWERS: No. You will learn to say 20 ISA with a smile on your face. 21 MEMBER APOSTOLAKIS: There will be a letter form this committee that we use the word "ISA," 22 23 the acronym? 24 MEMBER POWERS: Not for this stage. 25 MEMBER APOSTOLAKIS: Okay. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

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1	MEMBER POWERS: ISA
2	MEMBER APOSTOLAKIS: So we have time to
3	educate themselves.
4	MEMBER POWERS: ISA is going to be used to
5	identify the items relied on for safety, IROFs.
6	MEMBER APOSTOLAKIS: Isn't that some that
7	that Mary Drewin (phonetic) and her project on
8	coherence should pick? It is just trying to harmonize
9	the regulations. Why are we using ISA here and PRA
10	there?
11	MEMBER SIEBER: Yeah, we should drop PRA.
12	MEMBER APOSTOLAKIS: I'll talk to Mary.
13	MEMBER POWERS: Why don't you be nice and
14	let Mary at least sort out her problems with reactors?
15	Once she's proven herself on that, we will let her
16	move into facilities.
17	MEMBER APOSTOLAKIS: It may be late.
18	MEMBER POWERS: The number of mixed oxide
19	
20	MEMBER APOSTOLAKIS: You're using defense
21	in depth, too?
22	MEMBER POWERS: Once mixed remember
23	mixed oxide fuel fabrication facilities we intend to
24	review in this country is fairly limited right now,
25	George.
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1	MEMBER APOSTOLAKIS: Yeah.
2	MEMBER POWERS: So I would not expend an
3	enormous amount of effort plaguing poor Mary and her
4	activities.
5	MEMBER APOSTOLAKIS: It's initial national
6	importance.
7	MEMBER POWERS: More interesting to me
8	than the debate over ISAs or PRAs or some of the other
9	standards that they're using, and they use defense in
10	depth, but they have a peculiar definition of defense
11	in depth, and I list it up here in hopes that no
12	members slit their veins over this definition of
13	defense in depth because this is actually in the
14	regulations, and we can't change it. This easily is
15	one of the worst definitions of defense in depth
16	I've
17	MEMBER KRESS: That was in the white
18	paper.
19	MEMBER POWERS: What did you say?
20	MEMBER KRESS: That was in the white
21	paper.
22	MEMBER APOSTOLAKIS: Not this. Was this?
23	MEMBER KRESS: Yeah.
24	CHAIRMAN BONACA: The second paragraph,
25	yeah.
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1	MEMBER POWERS: This one just doesn't cut
2	it if you ask me in the definition of defense in
3	depth, but it will do for this facility.
4	The other requirements are that the design
5	must incorporate to the extent practical preferences
6	for engineered controls and enhance safety.
7	The strategy the application is adopting
8	is consistent with this approach. He has a mitigation
9	of prevention and mitigation in his facility. He is
10	looking at a large amount of redundancy in things like
11	the power coming into the site. They have this
12	conventional nested ventilation system for preventing
13	leaks to the outside, and they use a HEPA filtration
14	system.
15	That cause pause to us because in the
16	traditions of the Savannah River site where it has
17	always been to use sand filters for these, there has
18	been a bad history within the DOE complex in using
19	HEPA filtration systems, and we pursued this in great
20	depth, and I can definitely attest that the people
21	working for the applicant on HEPA filters know more
22	about HEPA filters than I will know if I stay up
23	nights studying, and they have definitely optimized
24	that technology and are using it in a redundancy

that's pretty interesting.

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1	It's redundancy, but not so much diversity
2	that makes for interesting discussions on defense in
3	depth, but looks to be effective.
4	Well, the application of the SER cover a
5	huge number of topics, a variety of safety
6	considerations. Where have we been focusing our
7	attention?
8	We've focused really in the areas of fire
9	and criticality. When you think about this facility
10	and getting radiation off the site boundary,
11	radioactive material off the site boundary affecting
12	the public, the only ways you think you can do it is
13	fire. There is just not another mechanism for doing
14	it.
15	If you think about how you contaminate the
16	site with things other than plutonium, the only way
17	you can do it is a criticality event. And so these
18	are the things that have occupied our attention.
19	The area of criticality is fairly well
20	established technology for preventing a criticality.
21	There's a double contingency standard. This is an
22	area of some ongoing discussion between the staff and
23	the applicant on the implementation and devotion that
24	you will give to the double contingency principles.
25	But, quite frankly, those principles have served us
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well in these areas.

1

We have a couple of questions as we go into this on other areas of potential criticality. Much of our attention has been devoted to fire, and fire is an issue for this facility. One of the working fluids you have is kerosene, and there's a lot of it on this site.

8 A lot of it is contained in welded steel 9 piping systems, and it's a little hard to understand 10 how you would ignite it, but quite frankly, you're 11 working with kerosene, and so there's a potential for 12 fire.

The other areas of fire is this peculiar thing called red oil, and if you have not worked in solvent extraction systems for plutonium, you turn around and start making funny jokes about communist petroleum products creeping into our system.

Red oil is one of those little mysteries 18 of process chemistry that abound in all big process 19 20 chemistry operations. This one involves а 21 decomposition product or the extractive agent, which is tertiary butyl phosphate that decomposes and 22 combines in some way with metal ions in nitrate to 23 form something 24 that can burn and burn fairly 25 energetically.

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1	It has been encountered in the PUREX and
2	its predecessor processes now for, gee, I guess the
3	first one was back in the
4	MEMBER SIEBER: Forty years.
5	MEMBER POWERS: 1940s was the first
6	time it was encountered.
7	MEMBER SIEBER: Forty or 50 years.
8	MEMBER POWERS: Fifty years or something
9	like that, and there have been some spectacular
10	events.
11	Every time there's one of these events,
12	people launch a big effort to understand what red oil
13	is. It's complicated. It's difficult to reproduce in
14	the laboratory.
15	They usually despair and apply some
16	administrative controls to avoid the problem, and we
17	go for another several years until some new feature of
18	the red oil fabrication bites us.
19	MEMBER SIEBER: I guess it's hydroxyl
20	amine nitrate, which is temperature sensitive.
21	MEMBER POWERS: That's another one we'll
22	get to.
23	MEMBER SIEBER: Okay.
24	MEMBER POWERS: This red oil is weird.
25	What happened within the community working
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with the PUREX process is they have found empirically that if they keep the temperatures low and do not allow the accumulation of degradation products for long times in the system, that they avoid the red oil process.

6 And that works. We don't have red oil 7 problems when you do that sort of thing.

8 The applicant himself is exploring the 9 chemistry in more detail. It's very interesting, but 10 quite frankly, he's adopting the empirical guidelines that have been developed over the years. 11 They just 12 keep the temperature low and don't allow the accumulation of degradation products as you recycle 13 14 this solvent and the extraction agent through the 15 In other words, we replace it every once in system. 16 a while.

There's another ammonium nitrate problem in the system similar to the kinds of empirical things to handle those problems. We have asked them about ammonium nitrate accumulation in ducts and things like that. I presume they'll get back to us.

My experience is that we have on occasion seen ammonium nitrate accumulation in duct work, but never any amount that would amount to anything. I mean, it's dust here and there.

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There are also interesting fire hazards associated just with working with the zirconium cladding on fuel. Zirconium metal has a history of spontaneous combustion when it's mistreated or inappropriately stored.

6 More interesting, I think, is an issue 7 raised by the brethren on the ACMW when they attended 8 the meeting, was to focus some attention on the 9 hazards associated with the waste streams and their 10 waste handling areas and whether there were fire 11 hazards associated with that.

Well, this is some of the issues that have 12 arisen in the course of the subcommittee meeting. 13 There is a catechism that has been developed primarily 14 15 in the Department of Energy for evaluating the hazards posed by accidents at their plutonium facilities. The 16 17 last time I spoke to you, I think I went into some of the details of what's called the five factor formula, 18 19 which involves taking the product of the material that's at risk, the damage ratio, and the damage that 20 occurs to the facility. What's the airborne release 21 fraction from that? How much of that is respirable? 22 23 What fraction of that leaks?

The catechism that's developed is that you go through this process, and you get to this airborne

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1	release fraction. You go to a database. A lot of us
2	call the Mishima database because Joe Fu Mishima put
3	it together from year and years of experimentation he
4	had done on what kinds f fractional releases you get
5	when you abuse and torment lutonium in various forms.
6	He put them all together in a book. If
7	you look up and you find an experiment that you think
8	is appropriate, you take the airborne release fraction
9	out of that. You assign some respirable fraction to
10	it, and you proceed with the multiplication.
11	There are at least two difficulties that
12	you encounter in applying the Mishima database. First
13	of all, which of all these things do you pick?
14	There are a lot of experiments that you
15	can pick, and it is never obvious to me at least which
16	one is the appropriate one to use.
17	The next issue you have is Joe Fu did his
18	experiments like he put a piece of paper in a Bunsen
19	burner and looked at what fraction of the plutonium on
20	that filter paper went up the stack.
21	Joe Fu did not do experiments in which he
22	took mixed oxide fuel fabrication facilities and
23	initiated accidents and measured the release fraction.
24	How do you take the release fractions that Joe Fu got
25	in his experiments and say what's the release fraction
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1	that you get from an accident at the facility?
2	The contention is made that these release
3	fractions are bounding, from the database are bounding
4	on the release fractions that you would get from the
5	events at the facility.
6	I have no doubt that that's true. It is
7	certainly true that in most cases the respirable
8	fraction is taken as one, and I will concede that
9	adopting the respirable fraction as bounding, I have
10	no problems with that.
11	The release fractions being bounded, I'm
12	quite sure they're true. However, my experience has
13	been that in the fuels area that we usually take
14	experiments and apply an elaborate amount of physics
15	to go from the experiment that we do on a small piece
16	of fuel to predicting what happens in reactor
17	accidents.
18	That phenomenological scaling, if you
19	will, is at least not transparent to me from the
20	database, what's done in the safety analysis, and
21	consequently, I don't understand why one can have a
22	confidence that the assessments they've done are
23	bounding.
24	What I do have a confidence in is that
25	this facility does not pose an enormous amount of
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hazard and that you can probably adjust those release 1 2 fractions by orders of magnitude and still not pose a hazard, and it's a little bit much to make a big deal 3 about this, but I would say that this is one of the 4 5 areas that the subcommittee is still pursuing. More important to me is the issue of fire 6 7 protection at the facility, though, in fact, I think they have a pretty good fire protection program 8 9 planned for the MOX facility. What I don't see is a very clear, precise 10 design basis for the fire protection system. I would 11 12 like to see something akin to what we do for the reactors that say we will have a channel, a pathway 13 for shutting this facility down, and understand 14 shutting down the facility is a peculiar comment. You 15 don't really want to shut it down. You want the 16 17 ventilation system to keep working. To keep going. 18 PARTICIPANT: MEMBER POWERS: So keeping this facility 19 20 working in the event of a fire, and I think they can It's just not a clearly set. 21 do that. 22 There are some problems, some issues that risen with respect to the strategies 23 have for suppressing fires. In one area they are using what 24 25 they call a clean agent for suppressing fires, and **NEAL R. GROSS** COURT REPORTERS AND TRANSCRIBERS

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1	what a clean agent is is some mixture of basically
2	carbon dioxide that blankets the burning material and
3	denies it oxygen. So the flames disappear.
4	But it does not quench the hot material.
5	In fact, it helps insulate the hot material, which is
6	already insulated by a char. Consequently, when the
7	clean agent is disbursed and oxygen again has access
8	to the material, the flames burst up again.
9	Those of you that recall our discussion of
10	the fire in the cabinets, in the instrumentation
11	cabinets at San Onofre, saw that that happened several
12	times, that they would suppress the fire with the CUS-
13	2 extinguisher. They'd open up the cabinet, take a
14	look at what kind of damage that had been done, and it
15	would promptly burst into flames.
16	It can be even worse than that. While
17	this stuff is hot, but not burning, it bakes out all
18	of the nice, volatile organics, which accumulate
19	because they're heavier than air. The oxygen comes
20	in, and you get a vapor combustion event that can be
21	modestly surprising.
22	Again, with the criticality in the waste
23	handling zone, it's something we're continuing to look
24	at, and you'll never guess that at least one member of
25	the committee raised the issue of material selection
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1	and corrosion. I'll leave it to you to guess who
2	might have raised that question.
3	It is a non-trivial question. Some of the
4	feeds they will be using do have chloride
5	contamination, a stainless steel system. It would be
6	an unfortunate thing to have a piping mistake in that.
7	Yes, sir?
8	MEMBER RANSOM: I wonder if they
9	considered the danger of the $CO_2$ extinguishing system.
10	You know, out at ATR they killed a couple of people
11	because of accidental discharge of the
12	MEMBER POWERS: Yeah, we had Link
13	Technologies, Ali and his team looked exactly into
14	that event. That's not really a hazard here. They're
15	using these things and nozzles and the glove boxes,
16	whatnot. We don't really have that problem here.
17	Well, the status. We have the best part
18	of a draft SER. Quite frankly, it is one of the
19	better SERs I've read recently. The staff in
20	producing this SER has in many cases, not all cases,
21	but in many cases, tried to communicate what the basis
22	they used in evaluating what the applicant has said
23	and why they think that that's a reasonable thing for
24	them.
25	The SER is quite comprehensive, as is the
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258 application report. They are basically pretty well 1 2 done documents. 3 There are a few outstanding issues. I've 4 listed down here 19. I'm sure that's a time dependent 5 quantity. Some of them are just adjusting language to 6 get that so that it's more aligned with what's in the 7 them are a regulations. Some of little more 8 substantive than that. 9 My feeling is that we're progressing 10 forward on this facility sufficiently that we can come directly to the ACRS with this facility without having 11 12 another subcommittee meeting, barring some contra 13 temps in the resolution of the outstanding issues. 14 The burden in doing that, of course, is 15 that the members do need to reacquaint themselves with 16 the facility. You don't use it very often, and you 17 just need to familiarize yourself with what they're trying to accomplish here in the safety analysis for 18 19 this phase. 20 There is a second phase in the licensing 21 process, which is the possession and operation permit. 22 Right now we're just setting down the design bases for 23 the construction permit, but it looks to me like we 24 can come directly to the committee. I think everybody 25 has got their stories pretty well organized. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS

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1	I look at the schedule, and it looks to me
2	like there's an August deadline for the staff to
3	produce the report. That would mean they have to come
4	to us in July. Okay?
5	They haven't told me that's what they're
6	going to do. That's my guess of what they'll do. If
7	Drew objects, do object now. Otherwise I think we're
8	on a pathway to look at this facility in July.
9	You can look at the documentation on the
10	Web, and it's pretty easy to get to. It comes down
11	pretty quickly, and it's more convenient to look at it
12	on the Web than to get what amounts to a set of
13	documents about this big.
14	Some of the background materials that you
15	might want to look at, standard review plans and
16	things like that, you'd probably need to have supplied
17	to you. They're not so convenient to get to.
18	That's all I had to say about the
19	facility. We are benefitted by having representatives
20	both from the staff and the applicant here, who I
21	invite to give me a grade on my summary of the
22	facility and correct any errors that I might have
23	allowed to creep into my discussion of this facility.
24	MEMBER LEITCH: Dana, one question I had
25	when we talked about this 18 months or so ago related
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1	to operator selection staffing levels, training
2	levels. I assume that's still yet future.
3	MEMBER POWERS: That would be in the next
4	stage.
5	MEMBER LEITCH: Yeah.
6	MEMBER POWERS: That would be in the next
7	stage.
8	Now, they address it, but I consider that
9	to be more for information than it is in the specific
10	requirements in the regulations for this stage. They
11	do address training and a lot of activities like
12	inspections, that sort of thing. They actually go
13	into either a nice amount of detail or a mind numbing
14	detail, depending on your interest in the particular
15	subject, particularly in the application.
16	So, Peter, give me a grade. Tell me if
17	there's anything we need to add to this.
18	MEMBER RANSOM: Dana, I've got a question.
19	This is a commercial facility located on a DOE site,
20	I assume, right?
21	MEMBER POWERS: Well, roughly.
22	MEMBER RANSOM: What's to prevent a
23	nuclear power facility being located on a DOE site and
24	then you avoid all of the NRC troubles?
25	MEMBER POWERS: Did you have some
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1	perception that I was a lawyer?
2	(Laughter.)
3	MEMBER POWERS: Have I misled you in my
4	discussion?
5	MEMBER RANSOM: Well, it's the first time
6	I've ever heard of a commercial facility being located
7	on a DOE site.
8	MEMBER POWERS: well, in your old
9	homestead up in Idaho, they are planning to locate the
10	2010 reactor up there.
11	MEMBER RANSOM: NHTGR?
12	MEMBER POWERS: And so I guess there is no
13	prohibition against that.
14	MEMBER SIEBER: What about Hanford?
15	MEMBER POWERS: Well, Hanford, now,
16	Hanford supplied steam to a commercial facility off
17	site. I don't know exactly what an assigned boundary
18	is, but I think they're off the site.
19	MEMBER SIEBER: Well, N reactor was on
20	site.
21	MEMBER POWERS: N reactor was on site, but
22	they pumped their steam across the river to the
23	facility that generated the power.
24	MEMBER SIEBER: Across the river
25	MEMBER POWERS: Yeah.
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1	MEMBER KRESS: On a scale of one to ten,
2	I give you a grade of 11 and a half.
3	MEMBER POWERS: No, no. Thank you, Dr.
4	Kress, and I will pay you afterwards. I want to hear
5	from people that know something about this facility.
6	CHAIRMAN BONACA: All right. Well, thank
7	you for the informed presentation.
8	MEMBER POWERS: If Peter or Drew have
9	anything to correct.
10	MR. HASTINGS: Yeah, this is Peter
11	Hastings with DCS, and of course, I would concur with
12	Dr. Kress.
13	(Laughter.)
14	MEMBER POWERS: It's not going to help
15	you, Drew.
16	MR. HASTINGS: With the sole exception of
17	your distance to civilization remark, I think the
18	(Laughter.)
19	MR. HASTINGS: highly accurate.
20	MEMBER KRESS: Yeah, I told him one state
21	away.
22	VICE CHAIRMAN WALLIS: Well, some people
23	might think the distance to civilization would be
24	several oceans.
25	MR. PERSINKO: This is Drew Persinko, the
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1	South Manager for the MOX facility.
2	I think you were accurate in your
3	presentation. I'd just like to point out to the full
4	committee a slight clarification, that when you showed
5	Part 70.61, you showed the consequences aspects of it,
6	but it's really what we call the performance
7	requirements which is a combination of consequences
8	with likelihood. So there's that aspect of 70.61 as
9	well.
10	MEMBER POWERS: Yeah, I started to go into
11	credible and incredible accidents and frequencies, and
12	I decided that even I didn't believe that.
13	VICE CHAIRMAN WALLIS: Okay. Thank you.
14	We now have another presentation from a
15	subcommittee chairman. That's George Apostolakis on
16	the integrated industry initiating event performance
17	indicator.
18	MEMBER APOSTOLAKIS: I have a conflict of
19	interest, Mr. Chairman.
20	VICE CHAIRMAN WALLIS: Yes, it's going to
21	be done by Bill Shack, Mario.
22	CHAIRMAN BONACA: Should I plug my ears
23	some?
24	PARTICIPANTS: No.
25	CHAIRMAN BONACA: Just keep silent.
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1	MEMBER POWERS: There will be no
2	snickering, sir.
3	CHAIRMAN BONACA: Do not speak unless
4	spoken to.
5	MEMBER APOSTOLAKIS: It's easy to say
6	nasty things about PRA because he can't say anything.
7	MEMBER SHACK: We had a subcommittee
8	meeting to review staff work on what they call the
9	industry initiating event performance indicator. The
10	development of this indicator is part of what is
11	called the industry trends program, and the industry
12	trends program is intended to complement the plant
13	level oversight provided by the ROP.
14	The ROP looks, of course, at a plant
15	specific kind of performance. The industry wide view
16	is sort of we had some discussion of what you would
17	learn from an industry-wide view since, again, a plan
18	has a problem; the industry has a problem.
19	But the thought was that the industry-wide
20	view could reveal trends that wouldn't be clear on a
21	plant specific basis, especially as we looked at
22	things like initiating events, which at least some of
23	them are fairly rare events, and if you looked at an
24	individual plant, you might wait some time before you
25	see them. If you pool the data on an industry-wide
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basis, you might see trends that wouldn't be revealed on a plant specific basis.

The industry trends are also useful in 3 4 providing what is for the NRC a congressionally mandated assessment of safety in the nuclear industry 5 6 in the country, and it was also argued they might 7 provide a context for considering the plant specific 8 results just like, again, looking at the plant 9 specific results in the context of industry 10 performance.

the industry trends program is 11 Now, 12 presumably a larger set of indicators that will be developed. This is, again, an ongoing program. 13 So we had a kind of a brief overview of the notion of an 14 15 industry trends program, this notion that we would be 16 looking at data and combining it to look at the 17 industry.

Then we looked at this one particular 18 indicator that they have been working on to develop 19 20 this so-called industry initiating event performance 21 indicator, and the initiating event indicator looks at a fairly broad range of risk significant initiating 22 events, and again, we asked them just how they 23 selected the initiating events that they did, and it 24 doesn't appear that they had, you know, sort of a 95th 25

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1	percentile of all the risk due to initiating events,
2	but they were concluded to be the most important
3	initiating events.
4	They had nine events for BWRs, ten events
5	for PWRs because the PWR initiating event includes a
6	steam generator tube rupture, of course, which has no
7	analogy in a BWR.
8	MEMBER POWERS: But there are bypass
9	accident analogies in BWR.
10	MEMBER SHACK: Yeah, but this is really a
11	CDF driven thing. So this is an initiating event for
12	CDF.
13	MEMBER POWERS: Well, you know, somehow it
14	strikes me as a perversion of the idea of risk
15	informed regulation if you're going to ignore those
16	things that don't fit in the CDF as surrogate for
17	risk, and that's what happens. Bypass accidents don't
18	fit using CDF as a surrogate for risk because even
19	though their initiating frequencies can be low, their
20	risk is very high
21	MEMBER SHACK: At the moment they're
22	focusing on, again, some of the other initiating
23	events. They're looking at small break LOCA, loss of
24	instrument air, loss of feedwater, loss of heat sink,
25	stuck open SRVs, loss of off-site power, general
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2 Again, some of these events occur often enough that you can get plant specific data. Others 3 are rare events, and you can get meaningful data only 4 And what they decided to on an industry-wide basis. 5 do for their performance indicator base was to use 6 7 industry average frequencies of these initiating 8 events.

9 So they would look at essentially all 10 instances of steam generator tube rupture in PWRs, all 11 instances of loss of off-site power for the families 12 of reactors.

13They would then trend these frequencies.14So that would be one level of indicators, would be the15industry trends in these initiating event frequencies.

Now, again, that tells you something about the trending of the initiating event, but the real trick is to estimate the risk significance of these trends, and they chose to do this by computing an average CDF associated with these initiating events.

So you have one set of indicators, which is really the trending of the frequencies. The other is this average CDF. They compute the average CDF by averaging over all plants as though the plant had the industry average frequency of initiating event.

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take industry 1 So your average you 2 initiating event frequency, and then you look and see what the associated CDF per plant is with those 3 initiating events, and then average that CDF. 4 5 For a plant, you can compute the CDF corresponding to the initiating events from the burn 6 7 bound importance measure for each initiator. These important measures are computed from the staff SPAR 8 models. 9 You then, again sum those up for each 10 11 plant, and then you average them over all the plants. You can interpret the resulting CDF as that due to a 12 plant with an average burn bomb importance and an 13 average frequency of initiating events. 14 15 Now, it turns out that the trending the 16 frequencies itself is not a trivial exercise. We have a statistical variation in the number of events from 17 18 year to year that's just fluctuating. In some cases over a ten to 15 year 19 20 period, there's a clear decreasing trend in the number of events, but now we may have reached the plateau, 21 22 and they were trying to get a baseline. Again, if we're looking for a trend, we 23 24 have to have a baseline to measure the trend against. 25 Their properties for a base was to use a long enough NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W. (202) 234-4433 WASHINGTON, D.C. 20005-3701 www.nealrgross.com

period to get a good estimate of the frequency and
short enough that the frequency over that period was
approximately constant.

They came up with some statistical rules 4 5 that allowed them to estimate these baselines for each 6 of the initiating events, and if you took those 7 baseline estimates of the frequencies of the 8 initiating events, then your average CDF for those 9 initiating events for BWRs was about one times ten to 10 the minus five for a reactor year, and it was dominated by loss of off-site power, loss of heat sink 11 and feedwater. 12

Your baseline CDF for PWRs is 3.65 times ten to the minus five per reactor year, and again, that's dominated by small break LOCAs, loss of vital DC bus and loss of off-site power.

They have, again, statistical rules to compute their baselines. They compute the current frequencies as three-year Bayesean running averages, and so they can now have essentially a baseline for the frequency. They have averages, current averages that they can compute, and they can then begin to establish as trends.

24 So what you get out of this analysis is a 25 current average value of the CDF, which in some sense

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1 is a measure of safety, and then you can begin to get 2 trends both in the average CDF and the initiating 3 frequencies which, again, tells you something about 4 performance in a sense.

Once you've established that you can compute these trends in this average CDF, you'll also have this question of, well, what does it mean. What is a threshold? What does the trend mean, and how do you set thresholds or measures of significance of the trend?

That's a problem they haven't solved yet. 11 That's essentially, you know, work in development. 12 They plan to hold a public workshop in July to do 13 14 this. We will presumably get a chance to review that work and to have some input into it before the final, 15 16 but again, this is a work in progress, and that's 17 basically the status that they've come up with, their methods for computing the baseline values and the 18 trends, and now the question is to come up with 19 20 criteria for significance in the trends and the 21 baseline guidance.

22Any of the others?23MEMBER SIEBER: Yeah, I think it's worth24adding why they're doing this in the first places.25One of the reasons that they're doing it is the one

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that Bill stated, which is there is a federal law that 2 requires the NRC to report to Congress abnormal events and the safety status of the industry, and this is one of the tools that they will use to do that, and it's a little bit different than what they are currently doing, which is basically reporting serious events that occur without any analysis of trends.

The other thing is that they plan to use it in a way that's quite similar to the matrix in the ROP.

In other words, if the trend is basically 11 12 negative or steady, they will not take any regulatory but as trends are identified which are 13 action. adverse, then they will go through a graded approach 14 15 to regulatory action, which would be first to engage 16 the industry to solve the problem; second, generic 17 communications to licensee; third would be generic safety inspections to determine the root causes and so 18 forth for adverse trends; and then lastly, declaring 19 20 whatever issue caused the negative trend a generic 21 safety issue.

So this is the other half of why they're 22 23 doing this because, you know, just developing performance indicators to put on the wall or in a 24 25 filing cabinet someplace is a lot of effort unless you

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do something with it, and that's what they plan to do. 1 Well, just one comment. 2 MEMBER RANSOM: 3 It looks like this performance indicator is based on a linear type model, in other words, the response 4 5 surface type approach that's used somewhat in 6 evaluating uncertainty in, you know, the existing 7 models. 8 And I would think this non-parametric 9 probability theory might be used here, you know, to 10 invoke some of the non-linearities of these initiating 11 events. 12 For example, like in some of the modern systems where presumably the cord is not uncovered, 13 14 although there's, you know, some probability in the 15 frequency distribution of initiating events that the 16 core would uncover, but the derivative would be zero 17 for the most part, and then only in the extreme case of some of these small, less probable aspects of the 18 19 event would it be, say, non-zero. 20 I'm wondering this would And how 21 incorporate that kind of an effect or does it only do 22 it in some average sense? Certainly the argument is 23 MEMBER SHACK: that the CDF is linearly related to the initiating 24 25 event frequency through the burn bound measure. NEAL R. GROSS COURT REPORTERS AND TRANSCRIBERS 1323 RHODE ISLAND AVE., N.W.

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1	MEMBER SIEBER: Yeah.
2	MEMBER SHACK: It's not clear to me that
3	there's a non-linear relationship there.
4	MEMBER SIEBER: I would think it's linear.
5	MEMBER SHACK: You know, this may be a
6	case where the response surface actually is linear.
7	MEMBER RANSOM: Well, I wouldn't think
8	just take some of the modern systems where core
9	uncovery (phonetic) is highly improbable, but if you
10	include the uncertainties involved in the estimation,
11	there is some at least small probability that the core
12	would be uncovered and core damage would occur.
13	VICE CHAIRMAN WALLIS: This isn't the
14	Burnbaum coefficient that's sort of integral of all of
15	that?
16	MEMBER SHACK: Yeah, right. I think the
17	Burnbaum coefficient would measure that.
18	MEMBER APOSTOLAKIS: But they're working
19	with BRA. BRA is linear in this work.
20	MEMBER SIEBER: Yeah, right.
21	MEMBER APOSTOLAKIS: You're referring, I
22	think, to physical phenomena where you have
23	MEMBER RANSOM: Well, this is a partial
24	derivative of the possibility of core damage frequency
25	with respect to frequency of the
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1	MEMBER APOSTOLAKIS: Oh, you mean
2	Burnbaum?
3	MEMBER RANSOM: Yeah, it's right here.
4	You know, the definition basically
5	MEMBER APOSTOLAKIS: Yeah, but it's the
6	partial derivative of a linear function.
7	MEMBER RANSOM: Yeah.
8	MEMBER APOSTOLAKIS: The PRA is a linear
9	function of the
10	VICE CHAIRMAN WALLIS: Yeah, you have
11	twice as many initiating events.
12	MEMBER APOSTOLAKIS: What?
13	VICE CHAIRMAN WALLIS: You have got twice
14	as many initiating events. You have twice as much
15	core damages.
16	MEMBER APOSTOLAKIS: That's right. Also
17	unavailabilities. It's linear in everything.
18	VICE CHAIRMAN WALLIS: It integrates out
19	all of these other things in PRA.
20	MEMBER APOSTOLAKIS: In fact, they take
21	the difference, don't they?
22	MEMBER SHACK: Well, they look at it both
23	ways, the difference or the absolute value.
24	MEMBER APOSTOLAKIS: No, I mean they don't
25	show a derivative.
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1	MEMBER SHACK: No, they don't show the
2	derivative. You're right.
3	VICE CHAIRMAN WALLIS: But they mention
4	the word "derivative."
5	MEMBER SHACK: You're right.
6	MEMBER APOSTOLAKIS: They do mention
7	derivative?
8	MEMBER SHACK: Yes, yes. I think the
9	problem is, of course, you don't walk into the SPAR
10	model and ask for a derivative.
11	MEMBER APOSTOLAKIS: Right, but why? I
12	don't understand it. Are they unhappy with other
13	measures? This is now an academic discussion.
14	VICE CHAIRMAN WALLIS: Therefore
15	important.
16	MEMBER SHACK: Well, I thought the
17	Burnbaum was a better measure. You're the PRA expert.
18	MEMBER APOSTOLAKIS: Better than what?
19	MEMBER SHACK: It was a more meaningful
20	measure because it didn't look at, you know, I take
21	one thing and I set it to zero and I take
22	MEMBER APOSTOLAKIS: Oh, okay.
23	MEMBER SHACK: You know, and so, in fact -
24	-
25	MEMBER APOSTOLAKIS: So the next step in
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1	three years will be the differential measure which now
2	takes this and divides.
3	MEMBER POWERS: Gosh, that sounds like a
4	major breakthrough, doesn't it, George? It's only
5	been in the literature now how long?
6	CHAIRMAN BONACA: All right.
7	MEMBER APOSTOLAKIS: Very good. Well, I
8	take that back. I didn't say "very good."
9	MEMBER POWERS: So marginally adequate,
10	huh?
11	CHAIRMAN BONACA: You cannot say anything.
12	You're completely
13	MEMBER APOSTOLAKIS: I can ask a question
14	for my own intellectual satisfaction.
15	CHAIRMAN BONACA: Yes, yes, sure. But you
16	cannot provide an answer.
17	(Laughter.)
18	MEMBER POWERS: Was that a statement of
19	permissiveness or ability?
20	CHAIRMAN BONACA: Both. No, no.
21	All right. With that we move to the next
22	item on the agenda. That's John is going to walk us
23	through future ACRS activities, a report of the
24	Planning and Procedures Subcommittee.
25	MR. LARKINS: Has everybody got a copy of
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1	the packet? I assume everybody has had a chance to
2	peruse through it.
3	PARTICIPANT: No. No, we didn't.
4	MR. LARKINS: And if there's no comments
5	we'll move on.
6	Okay. Let's go to the anticipated work
7	load for June. Well, let's look at May real quick.
8	We're finishing up the PRA letter this morning, and I
9	guess the vessel head penetration cracking and head
10	degradation letter and the Reg. Guide 1.178.
11	MEMBER SIEBER: Do we need a reporter for
12	this portion?
13	MR. LARKINS: No, no. We don't need you.
14	(Whereupon, at 9:32 a.m., the meeting in
15	the above-entitled matter was concluded.)
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## CERTIFICATE

This is to certify that the attached proceedings before the United States Nuclear Regulatory Commission in the matter of:

Name of Proceeding: Advisory Committee on

n/a

Reactor Safeguards

502<sup>nd</sup> Meeting

Docket Number:

Location: Rockville, MD

were held as herein appears, and that this is the original transcript thereof for the file of the United States Nuclear Regulatory Commission taken by me and, thereafter reduced to typewriting by me or under the direction of the court reporting company, and that the transcript is a true and accurate record of the foregoing proceedings.

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Eric Hendrixson Official Reporter Neal R. Gross & Co., Inc.

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