

September 9, 2003

Mr. David Lochbaum, Nuclear Safety Engineer
Union Of Concerned Scientists
1707 H Street NW, Suite 600
Washington, DC 20006-3919

SUBJECT: UNION OF CONCERNED SCIENTISTS COMMENTS ON THE NRC-
PROPOSED INDUSTRY INITIATING EVENTS INDEX FOR COMMERCIAL
POWER PLANTS

Dear Mr. Lochbaum:

By letters dated June 20 and July 31, 2003, Union of Concerned Scientists (UCS) provided comments on the NRC-proposed industry initiating events index for commercial power plants. The first letter was on our draft report dated March 13, 2003, titled, "Development of an Integrated Industry Event Indicator." The second UCS letter was written following our public workshop on the Industry Trends Program (ITP) which was held here at NRC headquarters on July 30, 2003. As you know, this workshop not only presented the ITP, but also focused on NRC efforts to develop the industry events index.

We understand that UCS still believes that the industry events index will not significantly contribute to the ITP for the overall reason (as stated in the June 20, 2003, letter) "that it fails to monitor sufficient meaningful data." We also note that in the July 31, 2003, letter you provided an example on why you believe the index will not be "viable," in part, because "it is neither a measure of risk nor performance." In both letters, UCS also presented other positions that we need to consider.

I can assure you that we are early in the process of developing this index and we will continue to keep all stakeholders involved in the process. I can also assure you that we are using and will continue to use quantitative and qualified data to generate the index. If you have any additional comments, please contact me at (301) 415-3565.

Sincerely,

/RA/

James W. Andersen, Section Chief
Inspection Program Branch
Division of Inspection Program Management
Office of Nuclear Reactor Regulation

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James W. Andersen, Section Chief
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Distribution for July 30, 2003, Industry Workshop

cc: D. Rasmuson
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