

**From:** The Specters [mhspecter@ns.sympatico.ca]  
**Sent:** Sunday, July 06, 2008 10:58 AM  
**To:** Jones, Joe; Randy Sullivan  
**Cc:** Charles Tinkler  
**Subject:** NUREG/CR-6953  
**Attachments:** Critique of COH.pdf; Letter to Sullivan.pdf

Mr. Randolph Sullivan

U.S. Nuclear Regulatory Commission

Washington, D.C.

Dear Mr. Sullivan,

I have examined NUREG/CR-6953, Volume 1, Review of NUREG-0654, Supplement 3, "Criteria for Protective Action Recommendations for Severe Accidents". NUREG/CR-6953 has many valuable features and the Commission has taken an important step forward by publishing it. Its discussions of precautionary evacuations and the history of human responses to emergencies are particularly useful. I have also monitored progress in the SOARCA effort to reassess the risks from nuclear power plants using modern technology and the many lessons learned since NUREG-0654 was first published. I was quite interested in the staff's Accident Analysis presentation on March 11, 2008 at the 20th Regulatory Information Conference. The conclusion that calculated releases from unmitigated accidents are vastly reduced and delayed in time compared to the SST-1 releases studied in 1982 and reported in NUREG/CR- 2239, is a welcome result.

As you know, there also has been a multi-year site specific analysis of emergency planning. I believe that the technological advances of this site specific analysis, merged with the generic analysis being developed by the NRC and Sandia, offer an excellent opportunity to advance the state of knowledge on emergency planning to the ultimate benefit of the public. Towards that end I am submitting a few comments, attached, on NUREG/CR-6953 which I hope will help bring these two important efforts closer together. Also attached is a critique of "Chernobyl on the Hudson?" which you may find has useful analyses of plume heating following a postulated aircraft attack on a containment building and some insights on fast breaking accidents, which I believe would be tied to the potential use of sheltering

near a site. I look forward to more detailed discussions with the NRC staff on modern emergency planning analysis.

Sincerely,

Herschel Specter, President

RBR Consultants, Inc.

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