



UNITED STATES
NUCLEAR REGULATORY COMMISSION
ADVISORY COMMITTEE ON NUCLEAR WASTE
WASHINGTON, D.C. 20555

ADNWL-1000

December 30, 1988

The Honorable Lando W. Zech, Jr.
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: DRAFT GENERIC TECHNICAL POSITION: GUIDANCE FOR DETERMINATION
OF ANTICIPATED PROCESSES AND EVENTS AND UNANTICIPATED
PROCESSES AND EVENTS

As a follow-up to our meeting with you and your fellow Commissioners on October 27, 1988, we are pleased to provide the following comments on the subject Draft Generic Technical Position (GTP). These written comments support the oral comments that we made during our meeting with you.

One of the problems we have noted with the GTP is a lack of clarity in the definitions of anticipated and unanticipated processes and events. This has led to confusion. One approach for correcting this problem has been suggested by Dr. J. C. Maxwell, one of our consultants. It would be to classify such processes and events as: (1) expected, (2) possible but not expected, and (3) highly improbable. This is based on our understanding that anticipated events as currently used in the draft GTP can be either expected or envisioned, whereas unanticipated events can be envisioned but are not actually expected to occur.

Although we realize that existing statutes and regulations may limit your flexibility in taking such an approach, a redefinition of these terms as suggested by Dr. Maxwell may be helpful.

Sincerely,

A handwritten signature in cursive script that reads "Dade W. Moeller".

Dade W. Moeller
Chairman

Reference:

Draft Generic Technical Position: Guidance for Determination of Anticipated Processes and Events and Unanticipated Processes and Events, transmitted by memorandum dated February 22, 1988 from Eileen T. Tana, Office of Nuclear Material Safety and Safeguards, to All Interested Parties.