

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Disapproved with comments.

ALOUEST REPLY BY.

Dale E. Klein

02/9 /

SECRETARY

December 21, 2006

MEMORANDUM FOR:

Chairman Klein

Commissioner McGaffigan Commissioner Merrifield Commissioner Jaczko

Commissioner Lyons

FROM:

Annette Vietti-Cook, Secretary

SUBJECT:

COMSECY-06-0064 - STATE OF THE ART REACTOR

CONSEQUENCE ANALYSIS COMMUNICATIONS PLAN

At the request of Chairman Klein, we have converted the subject memorandum from the Assistant for Operations, dated 12/18/06, to a COMSECY for formal Commission vote. Please reply to SECY by COB Monday, January 8, 2007.

Attachments: As stated

cc:

EDO

OGC OCA

OPA

CFO

06 DEC 21 PH 3-2

L/2

OFFIC LUSE NLY ENS VE INTE NAL IN ORN VION LIVE TED TO NRC NLE STHE MMIS JON TETER NES OTHER VISE

Chairman Klein's Comments on COMSECY-06-0064 State of the Art Reactor Consequence Analysis Communications Plan

I disapprove the communications plan as contained in the staff memorandum from Brian W. Sheron to Michael R. Johnson dated December 8, 2006. The staff should revise the communications plan to present the results of these studies <u>using improved risk communication methods</u> in the manner <u>previously directed by the Commission</u>. The Office of Public Affairs should participate in the development of the communications plan.

Given the current budget restrictions, the magnitude and benefits of the original proposal should be re-evaluated. Accordingly, I agree with Commissioners Merrifield and Lyons in modifying the Commission's direction in SRM SECY-05-0233 by reducing the initial scope of this effort to not more than eight plants representing a spectrum of plant vendors and technologies. The staff should keep the Commission informed of the status of this project and provide the results of these studies to the Commission with a recommendation as to whether continuing this project is necessary to achieve its objectives.

The staff should provide the Commission with the revised project plan and schedule within 30 days of the date of this SRM.

Dale F. Klein 02/9 /07



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

REQUEST REPLY BY:

1/8/07

SECRETARY

December 21, 2006

MEMORANDUM FOR:

Chairman Klein

Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jaczko

Commissioner Lyons

FROM:

Annette Vietti-Cook, Secretary

SUBJECT:

COMSECY-06-0064 - STATE OF THE ART REACTOR CONSEQUENCE ANALYSIS COMMUNICATIONS PLAN

At the request of Chairman Klein, we have converted the subject memorandum from the Assistant for Operations, dated 12/18/06, to a COMSECY for formal Commission vote. Please reply to SECY by COB <u>Monday</u>, <u>January 8</u>, <u>2007</u>.

Attachments: As stated

cc:

EDO

OGC

OCA

OPA

CFO

OFFICIA USE A LY-S NSITA INTER AL INFORMATION LIMITED TO ARC UNLESS HE
COMMISSION DETARMINAS
ATHER ASE

OF TAL USE CARE - SENSITIVE TERNAL TORMATIVE LITTER TO RC UNLESS TE COMMISSION DET RIM TES OF HE WIS

Commissioner McGaffigan's Comments on COMSECY-06-0064

I join with Chairman Klein and Commissioners Merrifield and Lyons in disapproving the communications plan as contained in the staff memorandum from Brian W. Sheron to Michael R. Johnson dated December 8, 2006.

The problem with the communications plan is that it unfortunately reflects what this effort has evolved into. We need to rethink everything including the acronym. We are trying to get an updated risk profile compared to the deeply flawed 1982 Sandia siting study. In doing so, we need to explain why the 1982 study was never embraced by the Commission. We do not need just a new communications plan, but a new project plan and schedule that takes into account the suggestions of my colleagues.

M

Edward McGaffigan, Jr.

CÉ CIAL ULE DNLY - STASIN VE INTERNAL INFORMATION L'AITED TONRO UNLESS THE COMMISSION LÉTELMINE OUTERN

STATES STATES WAS STATES OF THE STATES OF TH

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Oisappord. See attal

Commends.

REQUEST REPLY BY:

10/0/

SECHETAR

December 21, 2006

MEMORANDUM FOR:

Chairman Klein

Commissioner McGaffigan
Commissioner Merrifield
Commissioner Jaczko

Commissioner Lyons

FROM:

Annette Vietti-Cook, Secretary

SUBJECT:

COMSECY-06-0064 - STATE OF THE ART REACTOR CONSEQUENCE ANALYSIS COMMUNICATIONS PLAN

At the request of Chairman Klein, we have converted the subject memorandum from the Assistant for Operations, dated 12/18/06, to a COMSECY for formal Commission vote. Please reply to SECY by COB Monday, January 8, 2007.

Attachments: As stated

CC:

EDO

OGC OCA

OPA

CFO

OFFIC AL USE NLY-S' AST /E
INTE NAL IN ORMAT ON
LIV TED TO NRC V' LESS THE
COMMISSION DO ERMY ES
OTHER VISE

Commissioner Merrifield's Comments on COMSECY-06-0064 State of the Art Reactor Consequence Analysis Communications Plan

I do not approve the communications plan as contained in the staff memorandum from V Brian W. Sheron to Michael R. Johnson dated December 8, 2006. In light of the ongoing budget concerns, my review of the communication plan has raised concerns about the scope and cost of this effort to update consequence estimates of potential nuclear reactor accidents at commercial reactor sites in the United States. I continue to believe, as stated in my vote on this project, that the updated results of the consequence analysis can be a useful vehicle to help improve agency understanding of potential radioactive releases at nuclear power plants. However, I believe that it is time to rethink the magnitude of the original proposal and to look for opportunities to both provide perspective from the update of earlier consequence estimates as well as minimize the cost of performing the estimates before the agency continues to fund this program to the substantial resource commitments described in SECY-05-0233.

Therefore, I would like the staff to provide the Commission options for a smaller scope that would still provide some insights into the change in the consequence estimates due to advancements in consequence assessment modeling that have occurred since the consequence estimates where first calculated in 1982. The staff options could include the use of a limited set of reference plants that represent the range of reactor types and containment types. To the extent possible, the staff options should try to maximize the combinations so that a minimum set of consequence assessments need to be performed. The staff should also look to minimize the need to get information from licensees by using plants for which it already has analytical input decks available. The staff should also revise its communication plan to properly describe the scope and nature of the assessments that will be performed and the results that will be provided. The staff should be careful not to describe how these calculated results will be used as part of the regulatory decision making process until the full extent of the program is determined.

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20565-0001

*" request reply by:

1/8/07

Disapproved. See a

See attached comments.

SECRETARY

December 21, 2006

Gregory B. Jaczko

Date

MEMORANDUM FOR:

Chairman Klein

Commissioner McGaffigan Commissioner Merrifield

Commissioner Jaczko Commissioner Lyons OFF TAL V. 2 ONV 2-SF SIT INT RNA INFOF ATIC --L'ITEP TO NROUNL SS TO

THE WISE

FROM:

Annette Vietti-Cook, Secretary

SUBJECT:

COMSECY-06-0064 - STATE OF THE ART REACTOR

CONSEQUENCE ANALYSIS COMMUNICATIONS PLAN

At the request of Chairman Klein, we have converted the subject memorandum from the Assistant for Operations, dated 12/18/06, to a COMSECY for formal Commission vote. Please reply to SECY by COB Monday, January 8, 2007.

Attachments: As stated

cc:

EDO

OGC

OCA

OPA

CFO

OFFICAL US ONL SENT IVE
INTENDAL FOR ATION
LIVE TED ON NE UNLESS THE
OMNING SION SETEP INES
OTHER WISE

Commissioner Jaczko's Comments on COMSECY-06-0064 State of the Art Reactor Consequence Analysis Communications Plan

I disapprove some aspects of the communication plan developed by the staff, because I do not believe the plan accurately reflects the Commission direction in the staff requirements memorandum for SECY-05-0233. In particular, the staff was directed to indicate that the consequence analysis would not use a rigid cut-off of probabilities of 1×10^{-6} . The SRM states.

"In applying a screening radiological release frequency of 10⁻⁶ per reactor year..., the staff should be careful to define release groupings such that release characteristics are representative of scenarios binned into those groups. However, where possible, the groups should also be sufficiently broad to be able to include the potentially risk-significant but lower frequency scenarios (for example, the interfacing systems LOCA scenarios that bypass the containment).

It is my understanding that the staff intends to conduct the study in this matter, but I believe the communication plan should be updated to reflect this view.

I believe this study, if focused on risk analysis, will provide a useful tool to understand the risks of severe accidents at nuclear power plants. Therefore, I am not convinced of the need dramatically alter the initial approach for the study. I believe the staff, as initially proposed, should conduct an analysis for each plant, providing results that combine both consequences and probability distributions for those results. I agree, however, with Commissioner Lyons suggestion that the staff should present to the Commission a paper describing the results of the analysis for the initial set of plants. I am not opposed to increasing from 6 to 8 the number of plants to be initially covered. Since the staff has already discussed publicly the plants to be considered, I believe the 8 plants initially reviewed should include the plants already publicly discussed.

I continue to believe the voting record for SECY-05-0233 should be released along with a version of the paper that properly removes security related information.

Grégory B. Jaczko



UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

Disapprove, with comments.

REQUEST REPLY BY:

1807

Peter B. (Lyons Date

SECRETARY

December 21, 2006

MEMORANDUM FOR:

Chairman Klein

Commissioner McGaffigan Commissioner Merrifield Commissioner Jaczko

Commissioner Lyons

FROM:

Annette Vietti-Cook, Secretary

SUBJECT:

COMSECY-06-0064 - STATE OF THE ART REACTOR CONSEQUENCE ANALYSIS COMMUNICATIONS PLAN

At the request of Chairman Klein, we have converted the subject memorandum from the Assistant for Operations, dated 12/18/06, to a COMSECY for formal Commission vote. Please reply to SECY by COB Monday, January 8, 2007.

Attachments: As stated

cc:

EDO

OGC

OCA.

OPA

CFO

OFF MAL V SÉ ON ASENCATIVE
IN JÉRNA MINFO MATION
MITTE TO N'É UNLE S'THE
CON MISSIC DETERMINES
OT JÉRWY É

Commissioner Lyons' Comments on COMSECY-06-0064 State of the Art Reactor Consequence Analysis Communications Plan

I disapprove this Communication Plan in its present form. I support modifying the Commission's direction in SRM SECY-05-0233 by reducing the initial scope of this effort to not more than eight plants representing a spectrum of plant vendors and technologies.

The staff should adhere to its plan expressed in SECY-05-0233 to use generic insights from studies such as licensee Individual Plant Examinations (IPEs), Individual Plant Examination of External Events (IPEEs), NRC Simplified Plant Analysis Risk (SPAR) models, and Risk Analysis and Management for Critical Asset Protection (RAMCAP) studies, particularly with respect to the inclusion of external initiating events. These information sources coupled with use of a representative spectrum of weather and population densities should be used to develop the intended risk/consequence results for the selected plants. Staff should present these results using substantially improved risk communication methods in the manner previously directed by the Commission.

These results and the methods used should be provided to the Commission in a Commission paper with a recommendations as to whether continuing this project will be necessary to achieve its objectives. In addition, staff should also provide refined resource estimates for completing the project based on the experience gained up to that time.

Staff should modify the associated Communication Plan to reflect this new approach.

Peter B. Lyons Date