



Standards Committee

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Ms. Janet R. Schlueter, Director
Fuel and Materials Safety
Nuclear Energy Institute
1776 I Street, NW, Suite 400
Washington, D.C. 20006-3708

Subject: Industry Position on a Potential New ANS Standard, "Integrated Safety Assessments for Fuel Facilities" (ANS-57.11)

Dear Ms. Schlueter:

Thank you for your November 6, 2012, letter regarding the initiation of voluntary consensus standard (VCS) ANS-57.11, "Integrated Safety Assessments for Fuel Facilities," by the American Nuclear Society (ANS). Although we are often in agreement with the Nuclear Energy Institute (NEI), we respectfully disagree on the request to abandon this project and are continuing our standards development efforts.

As you are probably aware, ANS has been a Standards Development Organization (SDO) for more than 50 years and in that time has produced more than 200 standards that are used by both the public and private sectors far beyond those just related to nuclear power plants. In 1995, the passage of the National Technology Transfer and Advancement Act (NTTAA) and OMB Circular 119-A, both expanded the national standards development mission to save all branches of the Federal Government millions of dollars in standards development costs. In particular, the Department of Energy (DOE) and its Technical Standards Program Office are significant benefactors from our standards development efforts. In recognition of the role of VCSs, the Nuclear Regulatory Commission (NRC) has issued Management Directive 6.5 to encourage its staff to use VCSs in the regulatory process and to participate in standards development at all levels. Recently DOE Office of Health Safety and Security issued DOE-STD-1020 (2012) which referenced five ANS VCSs. Additionally ANS standards on extreme precipitation (ANS-2.31) and flooding (ANS-2.8) are under development to close some technical gaps in the aforementioned standard.

The point that I am trying to make is that, unlike NEI which focuses on just servicing the civilian nuclear industry, ANS standards are developed for the entire nuclear industry and international organizations such as International Organization of Standardization Technical Committee 85 – Nuclear Energy. TC 85 Subcommittee 6, Reactor Technology, is taking steps to have ANS standards adopted for international use. Unlike the excellent work products that are developed by NEI to support short-term needs of the civilian nuclear industry, national consensus standards have a much different focus. They are developed to have sustainable value to the industry and Federal Government to support day-to-day operations of nuclear reactors and non-reactor nuclear facilities, licensing positions, and regulatory development. Since VCSs are written by unpaid volunteers, they take an average of five to six years to produce and cannot support the short-term needs of our clients.

ANS will not entertain any efforts to inhibit its important mission of meeting of its NTTAA responsibilities and saving the government millions of dollars in standards development and maintenance costs, nor by not providing standards to nuclear utilities that need an enduring technical position based on many years of volunteer experiences for various reasons. In closing, I would like to compliment Mr. Jim Riley, NFSC NEI liaison, as he has provided us very effective interface with NEI and the civilian nuclear industry in areas which we are able to work together. We expect to continue our synergistic relationship with NEI for many years to come, even if our focus, at times, may be different.

Very truly yours,



Donald J. Spellman, Chair
ANS Standards Board

Attachment

- Cc: Mr. Carl A. Mazzola, Chair, Nuclear Facilities Standards Committee
Mr. Michael F. Weber, EDO, NRC
Mr. John D. Kinneman, NMSS/FCSS, NRC
Mr. Jim Riley, NEI liaison to ANS Standards Board