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**Standards Committee**

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December 17, 2012

Mr. John D. Kinneman  
Director, Division of Fuel Cycle Safety and Safeguards  
Office of Nuclear Materials Safety and Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**Subject:** U.S. Nuclear Regulatory Commission Request for Consideration of an American Nuclear Society Standard on Integrated Safety Assessments for Fuel Cycle Facilities

Dear Mr. Kinneman:

Thank you for your letter of December 7, 2012, requesting the initiation of an American Nuclear Society (ANS) voluntary consensus standard (VCS) for conducting Integrated Safety Analyses (ISAs) as specified in Title 10 of the Code of Federal Regulations (CFR) Part 70, fuel cycle facilities. While we are aware that not all segments of the industry recognize the need for this standard, this letter confirms that the ANS standards organization, as well as the highest level of ANS management and volunteer leadership, is fully committed to supporting this request. It is our firm belief that an ANS standard in this area provides the appropriate platform for subject matter experts from the entire nuclear industry to exchange knowledge and share insights in the development of an enduring ISA standard for fuel cycle facilities. Furthermore, as an ANSI-accredited standards development organization, the standard will be ensured approval through a structured consensus process and broad public review culminating with the certification as an American National Standard. This will be one of many standards efforts undertaken by ANS in its mission to support the precepts of PL 104-113, the National Technology Transfer and Advancement Act, to provide VCSs to Federal entities—especially in times of austere budgets.

Proposed standard ANS-57.11, "Integrated Safety Assessments for Fuel Facilities," has already been initiated and has a fully formed working group with committed and tested leadership. The working group understands the importance of addressing the quality of ISA methods that would support compliance with 10 CFR Part 70 regulations consistent with Commission guidance. The intent of this standard will be to:

- assure completeness in identifying credible accident sequences that may lead to "high" or "Intermediate" consequences as outlined in 10 CFR 70.61 performance requirements;
- use risk-informed, performance-based methods to assure the quality of ISAs making fuel cycle safety requirements;
- develop criteria to minimize the impact of common cause failures and human error; and,
- expand requirements as defined in 10 CFR 70.4 and NUREG-1520.

In closing, ANS welcomes the opportunity to support the industry through development of VCSs and appreciates the recognition of the U.S. Nuclear Regulatory Commission of trusting it with this important mission.

Very truly yours,



Donald J. Spellman, Chair  
ANS Standards Board

Attachment

Cc: Michael Corradini, Ph.D., ANS President  
Donald Hoffman, ANS President Elect/Vice President  
Carl A. Mazzola, Nuclear Facilities Standards Committee Chair  
Robert Eble, ANS-57.11 Working Group Chair  
Robert Fine, ANS Executive Director  
Rick Michal, ANS Scientific Publications and Standards Director