

D930422

The Honorable Ivan Selin
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Selin:

SUBJECT: DEFINITION OF A LARGE RELEASE FOR USE WITH SAFETY GOAL
POLICY

During the 396th meeting of the Advisory Committee on Reactor Safeguards, April 15-17, 1993, we discussed the staff's recommendations in regard to the definition of a large release related to the implementation of the Commission's Safety Goal Policy. During this meeting, we had the benefit of discussions with members of the NRC staff and of the document referenced.

In the draft Commission paper and in the presentation to the Committee, the staff expressed its belief that the development of the definition of a large release is no longer practical or useful and, therefore, it is requesting Commission approval to terminate efforts in this area. We believe the staff has made a conscientious effort with this activity and we agree with its basic conclusions. Our views are as follows:

1. A large release definition would either represent a replacement for the existing safety goals or, if made consistent with the quantitative health objectives (QHOs), would be redundant and unnecessary.
2. New guidelines being developed for implementing the Safety Goal Policy within regulatory analysis and issue prioritization processes adequately meet the originally perceived need for a large release component of the safety goals. These utilize a core damage frequency (CDF) and a conditional containment failure probability (CCFP).
3. Plant performance objectives, viz CDF 10^{-4} and CCFP 0.1, provide an easily understandable and adequate surrogate for the QHOs and provide quantitative prioritization for two basic aspects of defense in depth (prevention and mitigation). These could help ensure that a plant does not end up with great core protection but marginal containment performance.

We support the recommendation that the Commission approve the staff's proposal to terminate its effort to develop a definition of a large release.

Sincerely,

Paul Shewmon
Chairman

Reference:

Memorandum dated March 11, 1993, from Warren Minners, Director, RES/DSIR, for John T. Larkins, Acting Executive Director, ACRS, Subject: ACRS Review of Draft Commission Paper on Large Release Determination, w/Enclosure