

D920409

Mr. James M. Taylor  
Executive Director for Operations  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Taylor:

SUBJECT: NRC STAFF PROBABILISTIC RISK ASSESSMENT WORKING GROUP  
PROGRAM PLAN

During the 384th meeting of the Advisory Committee on Reactor Safeguards, April 2-4, 1992, we discussed the NRC staff PRA Working Group Program Plan. Because we saw nothing but a list of topics to be investigated by the group, and a proposed schedule, we can only comment on those. In particular, the depth of approach to any of the items on the list may turn out to be adequate or inadequate, depending upon the level and quality of effort devoted to the job.

As a general observation, we believe that most of the subjects of relevance are contained in the list. In some cases, that observation depends upon a broad reading of the words - only the implementation of the plan will reveal what was meant. We found no important items that were clearly missing.

We were not able to learn how much effort will actually be devoted to this enterprise, though we were told that the participants were not being relieved of their other duties. We believe that adequate effort is essential, and should be ensured.

We do not know what criteria were used in selecting the outside participants, nor those to be used in selecting the external review group. Where relevant skills are lacking in the staff, it is particularly important that they be present elsewhere.

This enterprise requires time for some education of the Working Group. For example, decision theory appears on the list, and few, if any, staff members are educated in this complex subject. There is an entire discipline here.

We were told that the Working Group was assigned to serve as an oversight group to the staff's effort to use the safety goals in assessing backfit analyses. We have previously expressed discomfort with that effort, and we think it is a mistake to burden this group with that task. It should be dropped from their charge.

We will have more to say as the program plan is fleshed out, and as we become more familiar with the skills of the participants we haven't met. For the moment, we are happy to have the staff proceed as planned.

Sincerely,

David A. Ward  
Chairman

Reference:

Memorandum dated March 24, 1992 from Eric S. Beckjord, Office of Nuclear Regulatory Research, NRC, for Raymond F. Fraley, ACRS,  
Subject: PRA Working Group Program Plan