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

Dear Chairman Selin:

SUBJECT: NEED FOR ACRS REVIEW OF RECENT STAFF PAPERS

During the 377th meeting of the Advisory Committee on Reactor Safeguards, September 5-7, 1991, we considered several staff papers that have been recently forwarded to the Commission for appropriate action. In all cases copies of the papers were provided to the ACRS office, but there were no requests for ACRS review and comment. While some of these papers may be limited to matters that are largely procedural and for which the Commission would not expect ACRS advice, it is not clear that all are. We believe we should have had an opportunity to comment on these important matters. The Commission may wish to postpone any action it intends to take on these papers until we have had an opportunity to consider the papers. This is an unusual cluster of SECY papers on important issues, and it may not be possible for us to review all of them on an expedited basis. During our 378th meeting, October 10-12, 1991, we will develop a schedule for our review.

The papers of interest, with some brief comments, are listed below:

SECY-91-229, "Severe Accident Mitigation Design Alternatives for Certified Standard Designs," dated July 31, 1991, with a request for a Commission "notation vote" by August 16, 1991.

An initial reading indicates that this SECY paper may involve only procedural matters, but we request more time to consider its import.

SECY-91-262, "Resolution of Selected Technical and Severe Accident Issues for Evolutionary Light Water Reactor (LWR) Designs," dated August 16, 1991 (copy received at ACRS office on August 27), with a request for a Commission "notation vote" by September 3, 1991.

This paper covers matters to which we have given considerable attention and on which we commented to the Commission in our report of May 17, 1991, "Proposed Criteria to Accommodate Severe Accidents in Containment Design," and also discussed during a meeting with the Commission on June 7, 1991. In addition, the Commission asked for staff response to the May 17, 1991 ACRS report in its SRM of June 18, 1991. Neither the ACRS report nor the SRM are mentioned in this SECY paper.

SECY-91-270, "Interim Guidance on Staff Implementation of the Commission's Safety Goal Policy," dated August 27, 1991, with a request for a "negative consent" approval by the Commission

by September 12, 1991.

The ACRS has played a major role in development of the Commission's Safety Goal Policy over the last several years and has previously commented at some length on the implementation plan.

SECY-91-272, "Role of Personnel and Advanced Control Rooms in Future Nuclear Power Plants," dated August 27, 1991, and forwarded to the Commission for information.

While this paper is only for information, it concerns an issue, digital computer-based control rooms, in which we have great interest. We believe it is vital that the advanced technology involved with these control rooms be carefully scrutinized during the design certification reviews, and we have concerns about whether the staff is properly equipped to conduct the necessary reviews.

SECY-91-273, "Review of Vendors' Test Programs to Support the Design Certification of Passive Light Water Reactors," dated August 27, 1991, with a request for "negative consent" approval by the Commission by September 12, 1991.

This paper is of fundamental importance to the Commission's design certification program, and an in-depth ACRS review would be highly appropriate.

Sincerely,

David A. Ward
Chairman