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The Honorable Lando W. Zech, Jr.  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: ACRS COMMENTS ON THE NEED FOR GREATER COHERENCE AMONG NEW  
REGULATORY POLICIES

During the 335th meeting of the Advisory Committee on Reactor Safeguards (ACRS), March 10-12, 1988, we discussed the problem which we see as an increasing lack of coherence and integration among several separate areas of policy making within the NRC. We understand that the NRC Staff is attempting to develop an integrated approach to implementing the Commission's Severe Accident Policy. In the usual course of events, we would expect to review the Staff's proposals at a later date. However, we believe it might be helpful to forward a few comments to you at this time.

The Severe Accident Policy is only one of a number of new Commission policies and programs concerning nuclear power plants that have been advanced over the past two or three years. Others relate to the safety goal, standardized plant designs, ISAP, and advanced reactors. In addition, the resolution of USIs and GIs has led, or might lead, to important new requirements and guidance for licensees in several areas. Although the NRC Staff, the ACRS, and the Commission have provided some overall guidance toward integration of these policies and new requirements, we believe this has been insufficient. As a result, licensees can be confused or burdened with contradictory new requirements from different parts of the NRC Staff.

For example, a part of the resolution of USI A-45, "Shutdown Decay Heat Removal Requirements," proposed some months ago, incorporated the use of safety objectives similar to, but not the same as, objectives being developed in implementation of the Safety Goal Policy.

We offer two suggestions for your consideration:

- (1) The attempt to integrate evolving policies and issues should not be limited to those embodied in the Severe Accident Policy, but should incorporate the entire range recently addressed in policy statements or currently before the Commission.
- (2) The Safety Goal Policy should not be viewed as just one of the several policies and issues on today's table. Instead, it should be seen as an umbrella policy which should be the principal tool for integrating and providing coherence to the entire set.

We expect to review the integration program being developed by the NRC Staff when it is available.

Sincerely,

William Kerr  
Chairman

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