

D850717

Honorable Nunzio J. Palladino  
Chairman  
U. S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Palladino:

SUBJECT: ACRS COMMENTS ON EMERGENCY PREPAREDNESS FOR FUEL CYCLE AND  
OTHER RADIOACTIVE MATERIAL LICENSEES

During its 303rd meeting, July 11-13, 1985, the Advisory Committee on Reactor Safeguards met with the NRC Staff to review the proposed rule on "Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees" (10 CFR 30, 40, and 70). This was also a subject for discussion during a meeting of our Subcommittees on Waste Management and Site Evaluation on June 19, 1985. The Committee also had the benefit of the documents referenced.

As a result of these discussions, we commend the NRC Staff for its careful and detailed analysis of emergency preparedness requirements for fuel cycle and other radioactive material licensees. We believe that the supporting document, "A Regulatory Analysis on Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees" (NUREG-1140), will be a valuable resource to licensees.

However, we have serious reservations about the implementation of the proposed rule on the grounds that problems of potential accidents may already be adequately covered by existing plans -- for example, by the licensee's Radiological Contingency Plans required by the NRC, and by the National Contingency Plans required under the Resource Conservation and Recovery Act of 1976.

We note also that the need for a formal emergency plan is made questionable by data covering some 500,000 licensee years of experience which show that, although some 5,000 accidents have occurred, none has resulted in a dose to off-site members of the public exceeding one percent of the one rem effective dose equivalent suggested in the proposed rule. This experience is supported by the NRC Staff analyses showing that the one rem dose is attained only when very conservative approaches are used in estimating off-site doses for a range of accident scenarios.

On the basis of these observations, we recommend that the proposed rule not be promulgated. Where the analyses show that accidents at a few selected facilities (such as UF6 and fuel fabrication plants) could be significant, perhaps some increase in emergency planning may be required on an individual plant and site-specific basis. Overall, however, we see no need for the proposed rule.

Sincerely,

David A. Ward  
Chairman

References:

1. Nuclear Regulatory Commission, Proposed Rule, 10 CFR Parts 30, 40, and 70, "Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees," draft dated June 12, 1985
2. Nuclear Regulatory Commission, NUREG-1140, Subject: A Regulatory Analysis on Emergency Preparedness for Fuel Cycle and Other Radioactive Material Licensees, dated June, 1985.

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