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

Dear Dr. Palladino:

SUBJECT: ACRS COMMENTS ON CONSIDERATION OF EARTHQUAKES IN OFF-SITE
 EMERGENCY PLANNING

During its 306th meeting, October 10-12, 1985, the Advisory Committee on Reactor Safeguards continued its review of the Proposed Final Amendments to 10 CFR Part 50, Appendix E, Consideration of Earthquakes in Emergency Planning. The primary document considered in this review was SECY-85-283, dated August 21, 1985. This topic was also the subject of a joint meeting of our Subcommittees on Site Evaluation and Extreme External Phenomena held on October 9, 1985. We had previously written a letter to you on this matter on June 10, 1985.

On the basis of this review, we offer the following additional comments:

1. Although we realize that the NRC Staff plans to address many classes and types of low frequency natural phenomena in its considerations of their complicating effects on off-site emergency planning, the ACRS believes that seismic events warrant specific attention. Our reasons for making this recommendation are covered in a separate letter to you dated October 16, 1985, "ACRS Report on Impacts of Natural Phenomena on Off-site Emergency Response."
2. If the Commission desires to address low frequency natural phenomena on a generic basis, we would urge that a lower bound be set on the occurrence frequencies for events that must be considered. Useful guidance on this subject is available in the Standard Review Plan, Section 2.2.3.
3. Although we concur, in general, with the four recommended changes in 10 CFR Part 50, Appendix E, as expressed in SECY-85-283, we believe that implementation of the recommendation for the development of a capability for augmenting the staff at a nuclear power plant under emergency conditions should not occur without consideration of the nature and extent of the accident. For example, what should be done if exposure rates in the vicinity of the plant preclude transporting people into the site? We also believe that it would be useful for the utility to supply an appropriately limited study of potential seismically induced effects which are relevant to off-site emergency planning.

We hope you will find these comments helpful.

Sincerely,

David A. Ward
Chairman

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