

## Wiebe, Joel

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**From:** Samuel Miranda <sm0973@gmail.com>  
**Sent:** Saturday, March 18, 2017 9:46 AM  
**To:** Wiebe, Joel  
**Subject:** [External\_Sender] A supplement to my comments  
**Attachments:** ICONE24-60472.pdf

Joel,

I would like to add the attached paper to the comments I made, on February 1st and March 15th, regarding my 10 CFR 2.206 petition. This is a peer-reviewed technical paper, published by the ASME in its Proceedings of the 24th International Conference on Nuclear Engineering (ICONE24, June 28-29, 2016, in Charlotte, NC). I call attention to the paper's annex, which outlines a history of many of the issues I raised in my petition.

I was reluctant to mention this paper, in my remarks, since it's copyrighted by the ASME. I believe that the ASME may allow it to be entered into the record, since it is in the public interest; not for commercial gain. I suggest you refer this question the NRC Library.

In any case, I believe I'm permitted to supply a copy for use by you, and the members of the Petition Review Board.

Sincerely,

Sam Miranda

ICONE24-60472

**STRATEGIES TO PREVENT BENIGN TRANSIENTS  
FROM BECOMING SERIOUS ACCIDENTS**

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**ABSTRACT**

Nuclear safety criteria are based upon the concept that plant situations that are expected to have a high frequency of occurrence must not pose a danger to the public, and that plant situations that pose the greatest danger to the public must be limited to situations that have a very low expected frequency of occurrence. This concept is implemented by grouping plant situations (or events) into categories that are defined according to their expected frequencies of occurrence. It is important not to allow the boundaries of these categories to be crossed. Plant designs cannot allow low-consequence events of high expected frequency to develop into events of more serious, high-consequence categories.

The development of this system of frequency-based categorization is discussed, followed by an evaluation of various methods that have been proposed and applied to show how minor events could be prevented from becoming major events.

*Copies of the complete paper are available at*

*WWW.ASME.ORG*

*or*

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