

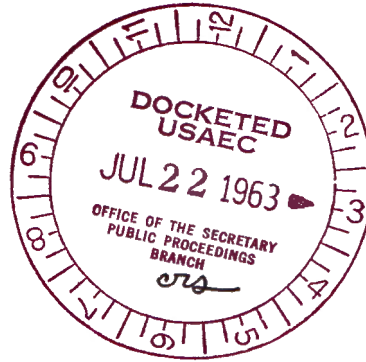
SECTIONAL COMMITTEE N6
(UNDER AMERICAN STANDARDS ASSOCIATION PROCEDURE)
REACTOR SAFETY STANDARDS

SPONSORS

AMERICAN NUCLEAR SOCIETY
THE AMERICAN SOCIETY OF MECHANICAL ENGINEERS
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SECRETARY

July 12, 1963



U. S. Atomic Energy Commission
Washington 25, D. C.

Attention: Mr. W. B. McCool
Secretary

Gentlemen:

REVISIONS OF 10 CFR 70 AND 71 AND PROPOSED MANUAL CHAPTER 0529

At a recent meeting of the Steering Committee of American Standards Association Sectional Committee N-6 (Reactor Safety) there was discussion of the proposed revisions of 10CFR 70 and 71, and Proposed Manual Chapter 0529. The first of these, 10 CFR 70, refers to generalized procedures for processes with fissile material. The second, 10CFR 71 gives specifications for the transportation of fissile materials. Manual Chapter 0529 specifies methods of fissile material shipment by Commission contractors.

The members of our Committee criticized all three of these proposals because they felt the proposals are too detailed and too rigid. The committee noted that the "Nuclear Safety Guide" which is AEC document TID 7016, was the principal basis of the regulations and that in some cases additional safety factors had been added to this guide. Some members of our Committee were among those responsible for the generation of TID 7016 in the first instance. TID 7016 was prepared for the guidance of those organizations with little or no experience in the nuclear field and as a point of departure in the design of processes by more knowledgeable groups. The information in the Guide, and hence now in the proposed regulations, was prepared nearly three years ago and does not reflect recent information. This does not mean that TID 7016 cannot be relied upon, but it does mean that it no longer reflects the best information and the best practice.

It is our opinion that regulatory documents in the field which is advancing as rapidly as nuclear energy should only define good practices. The details of processes, including nuclear safety measures, should be established by the operator from the pertinent information available to him. This information will include that in the literature, and, in addition, will include

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the results of recent experiments and analyses. To establish regulations by which practice is tied to old, incomplete, and in some respects out-of-date information, will severely restrict progress in the nuclear industry.

A code of good practice which our Committee believes to be of a suitable type is that proposed by the American Standards Association entitled, "Operations with Fissionable Materials Outside Reactors" which is presently in the final stages of review prior to establishment as an American Standard. This proposed standard was generated within the N6 Sectional Committee of ASA under the sponsorship of the American Society of Mechanical Engineers and the American Nuclear Society. It incorporates TID 7016 as a suitable source of information to the extent that TID 7016 is still up-to-date. We respectfully recommend that regulations similar to this proposed standard be established by the Commission in view of the restrictive type of regulation presently proposed and above referred to.

The Committee believes that the adoption of a type which it recommends would result in considerable saving in time, energy and expense on the part of both the operators and the Commission, with no loss of safety.

Our Committee recognizes that, in an official sense, the time for the comment on these regulations has past. We hope, however, that our comments will prove useful and influential.

Sincerely yours,



Chairman
N-6 Committee

MC Leverett:mk

cc: Ralph Chalker
PH Wilks
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Members of N6 Steering Committee
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