

OHIO DEPARTMENT OF HEALTH

DSI-10

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246 N. HIGH STREET
Post Office Box 118
Columbus, Ohio 43266-0118
Telephone: (614) 466-3543



GEORGE V. VOINOVICH
Governor

PETER SOMANI, M.D., Ph.D.
Director of Health

December 2, 1996

John C. Hoyle
Secretary of the Commission
U.S. Nuclear Regulatory Commission
ATTN: Chief of Docketing and Services Branch
11555 Rockville Pike
Rockville, MD 20852-2738



Dear Mr. Hoyle:

Attached are our comments on DSI papers 2, 4, 5, 6, 7, 10, and 11. This is a hard copy of what has already been submitted electronically to you. We also support all of the comments submitted by the Organization of Agreement States on the DSI papers.

Consideration of these comments by the NRC in its decision-making on these issues is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "ROBERT E. OWEN".

Robert E. Owen
Manager of Technical Services
Bureau of Radiation Protection

cf: Roger Suppes
Marcia Howard
Ruth Vandegrift
Harvey Brugger
Ron Goodwin
John Cooper

U. S. NUCLEAR REGULATORY COMMISSION
DOCKETING & SERVICE SECTION
OFFICE OF THE SECRETARY
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OHIO DEPARTMENT OF HEALTH
BUREAU OF RADIATION PROTECTION

COMMENTS ON NRC STRATEGIC ASSESSMENT ISSUE PAPER
AND DIRECTION-SETTING ISSUES (DSIs)

Introduction to DSI 10:

During the past decade, the NRC has strongly endorsed regulatory policies that encouraged industry to pursue standardization of next generation reactor designs. Standard designs are expected to benefit the public health and safety by (1) concentrating industry resources on common approaches to solving design problems that have wide application, (2) stimulating adoption of sound construction practices and quality assurance, (3) fostering constantly improving maintenance and operating procedures, (4) permitting a more effective licensing and inspection process. Since issuing 10 CFR Part 52, NRC has been involved in a range of activities related to reactor licensing for future applicants. Among those activities, the agency is reviewing two design certification applications for evolutionary light-water reactors {advanced boiling water reactor (ABWR) and System 80+}. It has expended considerable resources for these reviews, which are now nearly completed. It is not currently engaged in reactor licensing activities related to either the early site permit or combined license portions of the Part 52 licensing process.

In the advanced reactor area, the following DSI was identified:

Given the current environment, what should the commission's policy be on future reactors?

ODH COMMENT ON DSI 10:

The number of standardized advanced reactor designs for which the NRC will have to review and approve depends on the financial investment from industry to maintain a readiness to build a nuclear power plant. However, a great deal of knowledge and experience has been gained from the certification work on the ABWR and System 80+ designs to demonstrate that the design certification portion of 10 CFR Part 52 is a capable framework for advanced reactor standardization. Since there is no order or request to build a new commercial reactor in the United States anytime within the next fifteen years, perhaps the NRC could remain focused on the two reactor designs which have received certification work to date. Any additional future designs could be reviewed on a case-by-case basis. However, an applicant should request NRC review after signing a bonafide letter of intent with a nuclear steam supply system (NSSS) supplier to build an advanced reactor design. This would free-up NRC financial resources for other pertinent issues such as spent fuel storage, high-level & low-level radioactive waste, early site approvals, and licensing for future reactor license applicants.