



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAY 9 1979

MEMORANDUM FOR: Robert G. Ryan, Director
Office of State Programs

THRU: Harold R. Denton, Director *RD*
Office of Nuclear Reactor Regulation

FROM: Richard C. DeYoung, Director
Division of Site Safety and Environmental Analysis
Office of Nuclear Reactor Regulation

SUBJECT: DRAFT NUREG-0553, "BEYOND DEFENSE IN DEPTH"

This Office has not had ample opportunity to study this document to determine if the recommendations herein are adequately supported by the facts obtained through the investigations and survey efforts described. We recognize that it is quite likely that additional Federal support for State and local preparedness efforts is warranted. We question however, whether a grant program, funded in the manner suggested, is necessarily the best way to accomplish this.

We are somewhat surprised to find in the executive summary the statement that the recommended program would achieve "the greatest reduction in potential risk to the public from commercial nuclear power stations...." We are unable to find a basis for such a conclusion. Further, there does not appear to be any attempt at developing a rationale for reallocating light water reactor safety research funds to the proposed grant program on a relative risk reduction basis.

Of greatest importance however, is that we believe it is premature to view State and local government funding needs out of context of a Federal response role. The Three Mile Island experience has shown the existence of a very substantial Federal response capability (IRAP) as well as a need to consider how this capability might be better coordinated in future events.

We suggest that the report's investigations and surveys reflect potentially useful information but that it be published without specific recommendations.

RC DeYoung
Richard C. DeYoung, Director
Division of Site Safety and
Environmental Analysis
Office of Nuclear Reactor Regulation

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R. G. Ryan

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