



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

MAY 17 1979

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

FROM: William J. Dircks, Director  
Office of Nuclear Material Safety and Safeguards

SUBJECT: DRAFT REPORT - BEYOND DEFENSE-IN-DEPTH, NUREG-553,  
MARCH 30, 1979

The Office of Nuclear Material Safety and Safeguards has reviewed the subject draft report. Emergency preparedness planning for commercial nuclear power reactors is a subject being given considerably more attention since the Three Mile Island accident in terms of both adequacy of preparedness and sources of funding to support this activity. The draft NUREG-553 can act as a first step towards providing information on this important subject.

There are, however, several issues that should be addressed before final publication:

1. Have the assumptions and requirements based on the survey data obtained prior to March 28, 1979, changed as a result of the lessons learned from the TMI accident?
2. As stated on page II-113, the draft has not fully evaluated whether the funds obtained from the recommended increased NRC license fee approach can be legally distributed by NRC to state and local governments. Is the recommended alternative viable if new legislation is required?
3. The document uses "present worth" calculations to discount the future cost stream back to the present time. Using a 10 percent discount rate and ignoring the 7-10 percent inflation rate may underestimate the amount of funds required by the NRC licensing fee approach.

If you or Dr. Salomon have any questions concerning these comments, Mr. John Surmeier may be contacted on extension 74181.

A handwritten signature in cursive script, appearing to read "William J. Dircks".

William J. Dircks, Director  
Office of Nuclear Material  
Safety and Safeguards

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