

University of California



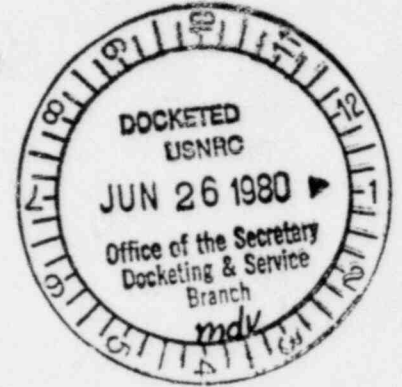
LOS ALAMOS SCIENTIFIC LABORATORY

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In reply refer to: Q-14-80-CS-76
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PROPOSED RULE PR-Misc Notice
Reg Guide

June 19, 1980



Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

ATTN: Docketing and Service Branch

Gentlemen:

Proposed Revision I to Regulatory Guide 8.12 is noted with particular interest. It is gratifying to see the effort that has been expended in the development of a national consensus standard reflected in a Regulatory Guide. I would, however, like to comment on the Regulatory Position as stated in the Draft Regulatory Guide and Value/Impact Statement issued in May, 1980.

I believe the Commission should reconsider Position 1, your disagreement with reduction of total risk, and approach more closely the position presented in ANSI/ANS-8.3-1979. The implication of the stated position of the Commission is that a higher total risk to employees as a result of alarm installation is acceptable, or that nuclear risks are far more important than other risks of the same magnitude.

I believe there are many areas in which the quantity, form, and method of storage of fissile material are such that while criticality is not impossible, it is so improbable that introduction of a criticality alarm system would result in an increased risk to employees. While there have been no fatalities as a result of false activation of criticality alarm systems, there have been significant injuries. We should not wait for a fatality to force us into a balanced perspective of risk.

Regarding statement (2) of the Commissions position, while I believe the statement on single coverage in the Standard is appropriate, the requirement for redundancy in the Regulatory Guide introduces only a modest cost increase and is not highly objectionable.

Paragraph 6.6 of the Standard references the dosimetry requirements of N13.3, as a matter of policy. I concur in the Regulatory Guide position that needs can generally be met by a quick screening technique.

Acknowledged by card... 6/26/80. mdv

IAP-11

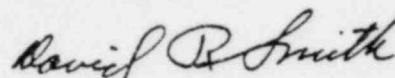
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As a final comment, I suggest that footnote (1) be changed to indicate that copies of ANSI/ANS 8.3-1979 may be obtained from The American Nuclear Society, 555 North Kensington Avenue, LaGrange Park, IL 50525.

The opportunity to comment on this proposed Regulatory Guide is appreciated.

Sincerely yours



David R. Smith
Chairman ANS 8.3

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