



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

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June 24, 1980

MEMORANDUM FOR: Tom Rehm, EDO
FROM: *MT* Sheldon Trubatch, OGC *43224*
SUBJECT: AIF REQUEST TO ADDRESS THE COMMISSION ON ATWS

By letter of June 12, 1980, the Atomic Industrial Forum (AIF) submitted comments on the staff's proposed resolution of the matter of Anticipated Transients Without Scram (ATWS) and requested an opportunity to address the Commission on this issue on the same day as the staff's presentation. This latter request was referred to the Office of the General Counsel for appropriate action. I recommend that the enclosed paragraph be included in the response to AIF. The paragraph is consistent with the proposed response to GE on this subject.

Enclosure as stated

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Proposed Paragraph for AIF Letter

Regarding your request to address the Commission on the same day as the staff's presentation on ATWS, the Commission believes that because ATWS is a complex subject a full discussion of this matter may require several Commission sessions. Moreover, the Commission has received other requests for an opportunity to make a presentation. In view of these circumstances, the Commission has decided to devote the first session on ATWS to the NRC staff, and to hear from other interested persons at later sessions. Of course, you will receive timely notification of scheduled sessions on ATWS and of the time allotted^r for your participation.

Atomic Industrial Forum, Inc.
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May 27, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555

Subject: Comments on NUREG-0460 Volume 4,
"Anticipated Transients Without Scram
for Light Water Reactors, Resolution of
Unresolved Safety Issue TAP A-9", USNRC
Office of Nuclear Reactor Regulation,
dated March 1980

Dear Mr. Denton:

This letter transmits the comments of the Atomic Industrial Forum's Committee on Reactor Licensing and Safety (CRLS) on the subject document, as solicited in 45 FR 20259, March 29, 1980. The AIF CRLS is comprised of approximately 100 licensing and safety professionals, representing utilities, reactor vendors, architect-engineering firms, consultants, and other industry organizations.

The AIF CRLS disagrees with the proposed resolution of the ATWS issue contained in Volume 4 of NUREG-0460. The bases for our disagreement include the need for design requirements for ATWS, inappropriate application of the single failure criterion, the adverse impact on the mitigative systems associated with imposition of safety grade requirements, the problem of regulator as engineer, the lack of closure of the issue, the magnitude of the ATWS risk, and other technical differences with the NRC Staff approach.

The attachment contains a discussion of these general issues as well as specific comments on the report itself.

We thank you for the opportunity to comment on the subject document, and we are prepared to discuss this matter further with you if you have any questions on the enclosed.

Sincerely,

A handwritten signature in cursive script, appearing to read "P. Clark".

cc: R. J. Mattson, USNRC
A. Thadani, USNRC
M. Plesset, Chairman, ACRS

DCG:tek

bcc: Mr. Fred Stetson -AIF

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