

IRV PETER -

- ① Staff performance poor in adjudicatory process.
- no mgmt support
- ② SRP ~~is~~ inadequate to assure that each application meets "legal" reqmts
- ③ Back fitting not well defined and poorly implemented
(page 11)
- ④ Staff deals too directly with entities other than utilities, which complicates resolution of issues
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- ⑤ Believes staff accepts procedural "fixes" rather than insisting on hardware changes to correct "real" deficiencies.
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- ⑥ Says we have achieved defense-in-depth only superficially, by add-ons (QA, procedures, additional systems) that don't ^{directly} address the real safety problems.
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- ⑦ Would separate standard setting more completely from regulation - sees a "legal" process - regulation - and a technical process involving industry (public, too?) which would set standards. p 14.
- ⑧ Believes industry has no incentive to build in more safety, but rather to concentrate on meeting (or beating) NRC requirements p 15
- ⑨ QA is oversold as a guarantor of safety - leads to "let someone else catch it" attitude on part of individual workers p 16
- ⑩ Emergency planning is overworked issue p 16
- local agencies well equipped and trained
 - nuclear releases generally do not result in acute disablement of large numbers of people as do natural phenomena, thus evacuation not as difficult:
 - toxic releases identifiable at levels well below threshold of acute disablement

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⑪ DBA

- emphasis on has led public to think in worst case accident terms.
- undue emphasis on systems to mitigate has led to no credit for other systems

⑫ Known design deficiencies identified in precursor events

Now known deficiencies which perhaps should have been identified ~~and~~ from analysis of "precursor" events, in themselves (?) did not "signal" a TMI event.

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