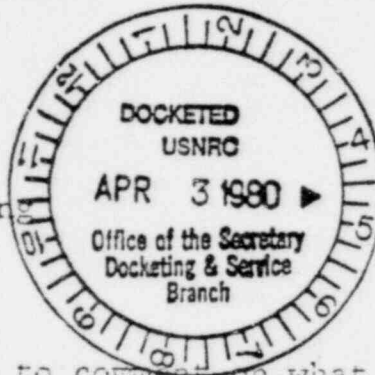


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March 18, 1980
2326 Glenn Avenue
Decatur, IL 62521

The Honorable Mike McCormack
United States Senate
Room 1503
Longworth House Office Building
Washington, D.C. 20515



Sir:

The purpose of this letter is to comment on what appears to be the current NRC trend in response to the TMI accident. I believe there may be a mismatch between the direction that the NRC is taking and the guidance provided by the various studies ostensibly undertaken to provide a basis for current NRC direction.

Draft NUREG-0660, "Action Plans for Implementing Recommendations of the President's Commission and Other Studies of TMI-2 Accident," is a case in point. The Kemeny Commission Report; the Rogovin Report; the National Academy of Public Administration Report, NUREG/CR-1225; and other documents broadly conclude the following:

1. Utilities should become better qualified to operate nuclear power plants.
2. The NRC should be better qualified to handle emergencies.
3. The industry was too complacent about potential nuclear accidents before TMI.
4. Plant design deficiencies were not the major factor at TMI.

I recognize that the above are very simplified and they could be expanded considerably. Nonetheless, they are sufficient for the purposes of this letter.

NUREG-0660 suggests that the NRC is concentrating primarily on a vast array of engineering design changes. Rather, they should be addressing the qualifications of utilities to operate nuclear plants and the preparedness of the NRC to handle emergencies. It is true that the outline of NUREG-0660 appears to be a balanced approach to all subjects. However, the real meat in NUREG-0660, and indeed the overwhelming thrust of NRC activities to date--including NUREG-0578, Short-Term Lessons Learned, and NUREG-0585, Long-Term Lessons Learned--is toward engineering design changes.

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The NRC seems to be continuing down its traditional path of assuring foolproof engineering design. This is not hard to understand when you consider the evolution of the AEC and NRC over the past thirty years. This evolution began at the time when nuclear reactor design was in its infancy. The overwhelming questions at that time were related to establishing inherent safety characteristics as demonstrated by the BORAX tests, for example. As time went by, the power reactor demonstration program evolved and again the major thrust was toward establishing inherent safety characteristics so that the infant industry could be on a sound basis consistent with the NRC's charter of responsibility for public health and safety.

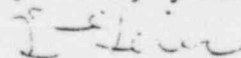
During the '60s and '70s, the modus operandi of the AEC and NRC did not change appreciably. Nuclear power was almost continually under attack from political and social reform organizations whose primary thrust was to undermine public confidence in nuclear reactor safety. Consequently, regulatory response, already steeped in tradition, was based on what the AEC and NRC understood best--a direct technical confrontation of the problems.

If analyses of TMI provided by the Kemeny Commission and others tell us anything at all, they suggest that it is time for the NRC to get out of the engineering business. The Kemeny Commission essentially concluded that it would have been better if the TMI operator had done nothing and let the reactor systems take care of themselves as they were designed to do automatically.

The NRC's defense-in-depth concepts have, I believe, been well-founded and proved as a sound basis for regulation in the past. However, I believe that philosophy has reached the point of diminishing returns. If we continue to focus our attention dogmatically on engineering design improvements, the industry could perish from want of a more balanced approach. It is time to start concentrating on broader and at least equally important areas such as emergency preparedness.

It is suggested that you take a hard look at what the NRC is presently doing. If you agree with my analysis, appropriate corrective action will be very evident. Suitable efforts to focus on the real lessons of TMI should be highly beneficial to the ultimate full use of nuclear power to the benefit of our society. This was the goal envisioned many years ago by the designers of the early National Atomic Energy Policies. I believe that is still a good goal.

Very truly yours,



Julius D. Geier

JDG:d1

cc: John Ahearne, Chairman, NRC
Max W. Carbon, Chairman, ACRS