Union of
CONCERNED
SCIENTISTS

October 31, 1980

Milton Plesset, Chairman, and Members
Advisory Committee on Reactor Safeguards
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Gentlemen:

Thomas Cochran of the Natural Resources Defence Council has shown me the transcript of an appearance of his before the ACRS on October 3, 1980, and his letter to you of October 27, 1980. I completely concur in his conclusion that the ACRS, as presently constituted, does not serve as an independent reviewer of nuclear safety issues.

The examples of this are numerous, but one recent instance in an area in which I have become very familiar has served to strengthen my conclusion. The Committee's review of the proposed fire protection rule showed a thorough lack of understanding of the development of this issue in the years since the Brown's Ferry fire. If it has shown anything, this history demonstrates a clear need, after five years of failed ad hoc negotiation with licensees, for objective, enforceable criteria. Instead, the ACRS pressed the Commission to reject the rule in favor of more case-by-case negotiation, while offering very little guidance on what the goals of that negotiation should be. That is precisely the discredited process which is responsible for the present chaotic situation. It is an understatement to say that the ACRS's position is extremely difficult to rationalize on safety grounds.

I support Dr. Cochran's opinion that a drastic change in the membership and orientation of the ACRS is needed. Until that time, appearances before the Committee are an exercise in futility.

Sincerely,

Robert D. Pollard

Robert D. Pollard
Nuclear Safety Engineer

cc: NRC Commissioners

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