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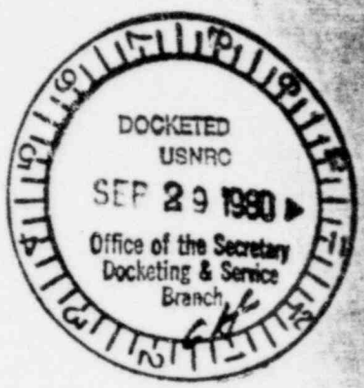

September 26, 1980

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

ATTN: Docketing and Service Branch

SUBJ: Response to Federal Register Note of July 8, 1980

Dear Sir:

The concept of establishing a means for deciding what must be included in Technical Specifications is supported and it is suggested that probabilistic risk analysis be considered as a method of accomplishing this objective. Probabilistic risk analysis is in the developmental stage. It has been or will be applied to several plants. Now is the time to determine if this analysis method can be expended to the area of Technical Specifications. By its very nature this method combines the probability of occurrence with the consequence of an event. This method could not only be used to determine the content of Technical Specifications, but also could be used to determine surveillance frequencies and periods of operational continuance with a given piece of equipment out of service. Such an analytical approach would tend to eliminate the present subjective requirements limiting plant operation.

It is also hoped that an alternate approach to the present Technical Specifications would include administrative requirements as an alternative to shutting down the plant because of reduced operability of equipment. Administrative requirements are presently used to augment partially inoperable fire protection equipment and should be considered for use with safeguards systems.

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Finally as implied in the Federal Register Note, removal of surveillance requirements from the Technical Specifications would reduce the complexity of the document and thereby reduce many of the document changes.

Sincerely,

Randall W. Pack
Acting Director
Criteria & Analysis Division

RWP:ed

cc: E. P. Wilkinson
P. Dietz