

Safety Goal Project  
(45 FR 71023)

May 13, 1981

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

Dear Sir:

The following is my comment on the "Development Of A Safety Goal - Preliminary Policy Considerations" and the particular documents NUREG-0764 and NUREG-0739.

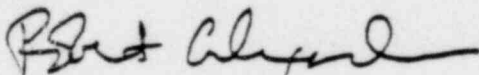
It appears you are looking for a safety goal that is comprehensive, logical, verifiable, practical, and publicly acceptable. That is noble and good. I question the third characteristic mentioned.

I think you are going to be able to verify just one more Class 9 accident; only one. Then you won't have to postulate these farsical statistics. Because then the last characteristic will come into play: public acceptance. Total lack of it for any nuclear program.

NUREG-0764 states at page 4: "It should be noted that absence of strict verifiability, in a statistically meaningful sense, does not doom all quantitative goals for high-consequence, low-probability events to failure on this criterion." That needs elucidation. I claim it DOES doom all these quantitative goals.

The agency's safety goal is specious at best as long as these 1200 Mw behemoths operate.

Sincerely,



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