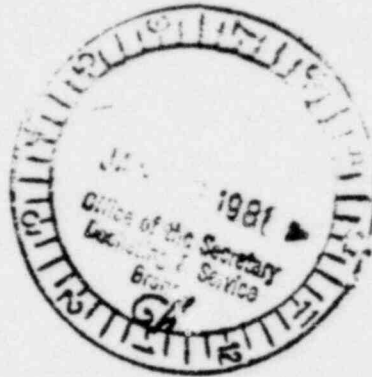


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Alabama Power
the southern electric system
ND-80-0032

January 2, 1981

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

~~DOCKET NUMBER~~
~~RECORDED RULE~~ **PR 50**

Attention: Docketing and Service Branch

45 FR 65474

Subject: 10CFR Part 50, Domestic Licensing of Production and Utilization Facilities; Consideration of Degraded or Melted Cores in Safety Regulation, Advance Notice of Proposed Rulemaking (45 FR 65474), October 2, 1980.

Gentlemen:

Alabama Power Company has reviewed the subject advance notice of proposed rulemaking (ANR) issued by the NRC. We endorse the specific responses to ANR questions submitted by Atomic Industrial Forum Committee on Reactor Licensing and Safety. Alabama Power Company representatives were instrumental in compilation of these responses. In addition, we offer the following general comments:

As we have stated in our earlier letters commenting on the interim rule and on the proposed rule to require licensees to document deviations from the standard review plans, Alabama Power again strongly urges the Commission that an integrated approach be taken on the number of rulemakings presently contemplated by the NRC so that the technical bases for these interrelated rules can be adequately evaluated, understood, and established. These rulemakings include the development of safety goals and methodology, the subject degraded core considerations, establishment of minimum required engineered safety features, reactor siting, and emergency planning. The issues contained in these rulemakings are closely interrelated and should, for that reason, be addressed in a coherent and logical sequence. If this policy is not adopted by the NRC very little will be achieved towards reducing the risk of uncertainty associated with the use of nuclear power or towards reduction of regulatory uncertainty on issues important to public health and safety. This policy most probably will result in issuance of a number of premature rules and frequent changes to them thereafter. The same viewpoint generally has been pointed out by numerous other organizations and concerned groups, including the ACRS, NRC Staff (ACRS Subcommittee Meeting on Class 9 accidents, November 21, 1980), and the



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Rogovin Special Inquiry Group. Hence the NRC should adopt a sequence in these rulemakings, starting with the establishment of a quantitative safety goal and proper methodologies for its application, then move on to degraded core matters, minimum engineered safety features, emergency planning, and siting criteria. This sequence is nearly identical to that presented by the NRC Staff at the November 21, 1980, ACRS Subcommittee meeting, and will go a long way toward alleviating the widely stated concern of "regulatory uncertainty". In this context, we whole heartedly endorse the observation made by the Nuclear Safety Oversight Committee in its September 26, 1980 report to President Carter, where it is stated that "Stability is itself a safety asset, and complaints from the industry that the rules change too frequently are not entirely without merit....".

With regards to elements of a logically and technically sound degraded core rulemaking, it is recommended that the Commission consider the following important steps prior to their promulgation:

- a. Compilation and documentation of available technical information and factors related to degraded core matters. In other words, the first step should be to establish what we know today.
- b. Issuance of a policy and procedures whereby this technical information will get a careful and thorough analysis and review.
- c. Identification of dominant risk contributors and their probabilities. This step should consider the capabilities of existing engineered safety features and emergency operating procedures including the use of PRA techniques.
- d. Assessment of whether or not a degraded core rulemaking is needed. If it is ultimately decided to proceed with one, define the scope and what additional research over and above what is known that is needed to technically bound the matters of risk significance. In either case this should be done after the establishment of quantitative safety goals.

Alabama Power believes that the issue related to degraded cores need not be dealt with on a crash basis. The safety record of nuclear power plants is excellent and the responses of the industry to TMI have significantly improved the safety of these plants. Many provisions, in the form of hardware additions or changes, improved operator training, and other improvements have been incorporated into our plants as a result of our own evaluation as well as various Commission Orders, Regulatory Guides, IE Bulletins, and Action Plans since the TMI accident.

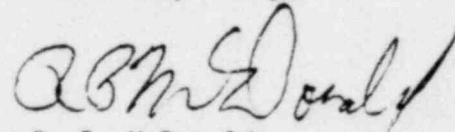
January 2, 1981

As reported by many studies, nuclear power plants represent quite low risk to the public compared to other risks in our society. Therefore, we neither see an urgent need for promulgating a rule that would fabricate various prescriptive mitigating systems for a very low probability end-of-spectrum accidents nor do we necessarily agree that these mitigative systems would necessarily improve safety as compared to preventive features and measures which already exist, or can be implemented, in the design and operation of these plants. Hence it would be prudent to follow some logic, as proposed above, which will be more likely to achieve the main objective of establishing what is really needed to demonstrate the adequacy and acceptability associated with the probability levels and the consequences of these accidents.

Alabama Power is participating in the Industry Degraded Core Rulemaking (IDCOR) program. We are concerned with the current process of promulgating rules on various interrelated major subjects and again urge the NRC to take a coherent and logical sequence in this effort which will result in sound and prudent requirements.

Please inform us if you have any questions.

Yours very truly,



R. P. McDonald

RPM:WM

cc: Mr. R. A. Thomas
Mr. G. F. Trowbridge
Mr. L. L. Kintner
Mr. E. A. Reeves