



PUBLIC SERVICE INDIANA

S. W. Shields Senior Vice President - Nuclear Division

Mr. Samuel J. Chilk Secretary of the Commission U. S. Nuclear Regulatory Commission Washington, DC 20555

Attention: Docketing and Services Branch

Dear Sir:

In the Federal Register of October 2, 1980 (45 FR 65474) the Nuclear Regulatory Commission (NRC) staff solicited responses to questions dealing with an advance notice of rulemaking concerning degraded cores. Public Service Company of Indiana, Inc. (PSI) previously commented on the draft interim rule, which was proposed via the same issue of the Federal Register.

PSI concerns with respect to the long-term rulemaking effort are as follows:

- o The NRC's "Safety Goal" program is intended to define societal risk versus cost factors. The resulting "Safety Goal" is important to the rulemaking effort in that it is needed to determine the value of systems which would mitigate the consequences of a degraded core.
o The technical basis for the long-term rule is not yet adequate. Before engineered safety features can be analyzed for cost and safety impacts, as a minimum, accident scenarios and accompanying source terms must be defined.
o Probabilistic risk analysis is the proper tool for system design analysis. This, coupled with the "Safety Goal" and a realistic technical basis, should be used to determine the need for and the required contents of a long-term degraded core rule.

The same logic also applies to the siting policy rulemaking and the emergency planning rule. (PSI suggests that recent source term theories, particularly regarding radioiodine chemistry at TMI, indicate that some portions of the emergency planning rule may be inappropriate.) PSI recommends that both the siting policy and long-term degraded core rule-makings should be deferred until the "Safety Goal" and technical basis efforts are complete.

PROPOSED RULE PR 50 45 FR 65474

December 30, 1980



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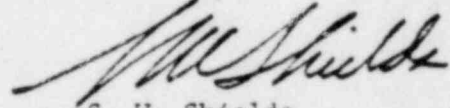
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PSI also understands that the Atomic Industrial Forum, Inc. (AIF), is planning to comment on the advance notice of rulemaking. We suggest that the AIF comments should be given particular attention due to the formation of the IDCOR (Industry Degraded Core Rulemaking) program. We also agree with AIF that a NRC policy statement is needed concerning the use of the interim rule, the development of the final rule, and assurance that individual hearings will not pre-empt generic proceedings.

PSI appreciates the opportunity to comment.

Sincerely,



S. W. Shields

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