

Safety Goal Project
45 FR 71023

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VICE PRESIDENT
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May 22, 1981

TELEPHONE AREA 704
372-4083

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

Attention: Docketing and Service Branch

Re: Development of a Safety Goal;
Preliminary Policy Considerations

Dear Mr. Chilk:

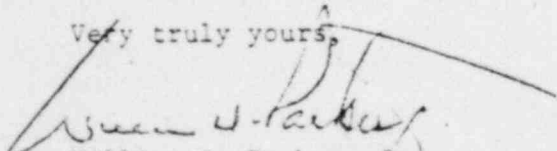
With regard to "Development of a Safety Goal; Preliminary Policy Considerations," published in the Federal Register March 26, 1981, we support the comments provided May 15, 1981, by the Atomic Industrial Forum Committee on Reactor Licensing and Safety, as well as the AIF policy paper entitled "A Proposed Approach to the Establishment and Use of Quantitative Safety Goals in the Regulatory Process."

We believe that the application of probabilistic risk techniques through the use of meaningful quantitative safety criteria provides a means for assuring that an acceptable level of safety exists. Use of cost-benefit analyses can then be made to identify areas in which further reductions in risk are warranted and obtainable, as well as other areas in which regulatory requirements are unduly restrictive with respect to their effects in increasing safety.

While Probabilistic Risk Assessment (PRA) methodologies are undergoing further development, we believe that they are sufficiently advanced to permit application to current reactor safety considerations. Meaningful use of PRA requires realistic modeling. Where analytical results are close to the safety goals, additional engineering judgement or more detailed analysis will be required to determine the need for any further action.

Therefore, we believe NRC should proceed with the prompt formulation of a set of quantitative safety goals, rather than with just developing an approach to safety goal definition at this time, particularly in light of the near-term needs for such goals, such as the degraded-core rulemaking. We believe the AIF policy paper referred to above provides a rational and useful set of safety criteria and applications, and urge that it be given careful consideration.

Very truly yours,


William O. Parker, Jr.

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