



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

MAY 29 1987

MEMORANDUM FOR: Commissioner Asselstine

FROM: Victor Stello, Jr.  
Executive Director for Operations

SUBJECT: NUREG/CP-0084, PROCEEDINGS OF THE  
WORKSHOP ON CONTAINMENT PERFORMANCE  
DESIGN OBJECTIVE

I am replying to your memorandum of April 13, 1987 regarding the subject proceedings and the request of one of the invited participants, Mr. Daniel Hirsch, to have his views explicitly incorporated in that document. In weighing the merits of that request, I believe the following information is important. The purpose of the workshop was to stimulate discussion with the staff on a variety of conceptual approaches to the formulation of a containment performance design objective (CPDO). The purpose of the proceedings was to document a general summary record of the discussions that occurred during the day and half of the workshop. The proceedings do not constitute either a consensus or majority report, do not contain any recommendations, nor are the views of any of the invited participants attributed by name or affiliation. Prior to the workshop it had been anticipated that there might have emerged some areas of consensus as well as areas of significant disagreements. The Meeting Summary, as published, reflects both areas and the text of the Proceedings amplifies them in more detail.

The staff contracted with Brookhaven National Laboratory (BNL) to provide technical and administrative support for the workshop, and Dr. Herbert Kouts was selected by BNL to act as the workshop chairman. BNL recorded the workshop discussions and copies of the audio tape can be made available to interested persons. BNL also prepared the proceedings document and requested all invited participants to comment upon an initial draft with respect to the accuracy with which it characterized and summarized the discussions that took place during the workshop. Mr. Hirsch was the only participant that requested specific incorporation of his post-workshop written comments, letters, and an 18-page report entitled "Assessing the Need for Containment Performance Design Objectives for U.S. Nuclear Reactors," a "Minority Report" authored by Mr. Hirsch.

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BNL staff reviewed all participants' comments on the draft and made revisions which, in their judgment, were relevant and appropriate to the general summary nature of the proceedings document. Mr. Hirsch's comments on the draft itself were directed to three of the proposed Meeting Summary Statements, specifically items 3, 6, and 8. Changes made to these for the final document reflected a balancing of all participants' views and comments, including, in part, Mr. Hirsch's. For example, the first clause of item 3 is consistent with his view, but not the second. Similarly, in item 8, Mr. Hirsch's view is that negative aspects of human performance should be considered, but others felt that positive aspects also merited consideration. With respect to item 6, Mr. Hirsch believed that he had proposed a new option. The workshop was structured to discuss different methodological approaches (options) to the definition of a CPDO. BNL staff concluded that Mr. Hirsch's suggestion was not new in this sense, but a variation on the specific quantification of one of the options discussed. The numerical values that had been selected by the staff for each of the options presented to participants were intended only as potential ball park or sample values and not as definitive proposals.

Mr. Hirsch's views expressed during the workshop are also contained in the text of the Proceedings, for example, under Section 2, page 3 at the middle of the long paragraph where reference is made to the Chernobyl accident and to a need to build up public confidence. They are also reflected in Section 4, page 8 in the bottom paragraph where reference is made to "high confidence" levels for the elements of a CPDO.

Members of the NRC staff also reviewed the first draft of the Proceedings and the written comments of the participants that were sent to BNL. In August 1986, the staff informally provided to BNL comments on the draft that indicated that Mr. Hirsch's appropriate comments and corrections should be incorporated. The staff also noted that, given the format selected by BNL for the Proceedings, it would be inappropriate to include Mr. Hirsch's Minority Report. The staff did not regard this as advice.

With respect to the "Minority Report," it was Dr. Kouts' decision that it should not be incorporated in the Proceedings, and that it would not be fair to the other participants to grant Mr. Hirsch's request since the proceedings document itself could not be construed as a majority report. NRC staff and management directly involved with this activity had no objection to that judgment. All of the participants' comments, plus Mr. Hirsch's "Minority Report", have been placed in the NRC Public Document Room and constitute additional material for staff consideration in its still current efforts to resolve the CPDO issue.

As to Dr. Kouss' involvement in other NRC activities, he has in the recent past reviewed NRC's research program on uncertainties in estimates of source terms from severe accidents, served as chairman of one of four expert panels as part of this review, and published a report, NUREG/CR-4883, on this subject in April 1987. He also chaired BNL's expert panel to review the uncertainty analysis in the Reactor Risk Reference Document (NUREG-1150, DRAFT) in April 1987.

In summary, I believe that the discussions of all workshop participants on the questions posed to them at the workshop are fairly represented without attribution in the proceedings. Further, with the availability of all participants' comments and Mr. Hirsch's report in the PDR, I do not believe that revision and republication of the Proceedings document would be warranted.

Original signed by  
Victor Stello ✓

Victor Stello, Jr.  
Executive Director for  
Operations

cc: Chairman Zech  
Commissioner Roberts  
Commissioner Bernthal  
Commissioner Carr  
SECY  
OGC