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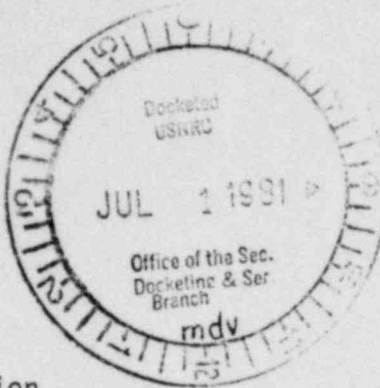
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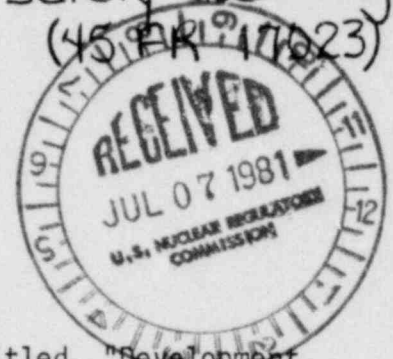
June 25, 1981

NS-TMA-2461



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

Safety Goal Project
(45 PR 17023)



Attention: Docketing and Service Branch

Subject: Comments on Federal Register Notice Entitled,
"Development of a Safety Goal-Preliminary
Policy Consideration"

Dear Mr. Chilk:

Westinghouse has reviewed the Federal Register Notice entitled, "Development of a Safety Goal-Preliminary Policy Consideration," and the two referenced reports: NUREG-0764, "Toward a Safety Goal: Discussion of Preliminary Policy Considerations" and NUREG-0739, "An Approach to Quantitative Safety Goals for Nuclear Power Plants" by the ACRS.

We commend the NRC intention to develop a quantitative safety goal as we believe this to be an essential aspect to licensing stability and to the decision making process in upcoming planned rulemakings such as the degraded core rulemaking. Therefore, we encourage the NRC to continue its examination and assessment of the considerations pertinent to the development of safety goals and to reach a timely and reasoned conclusion. The following comments are submitted for consideration in the preparation of a safety goal.

Regarding safety goal forms, we believe the goals must be high level quantitative goals and address both individual and societal risks. In addition, cost-benefit considerations should apply even though the individual and societal limits are satisfied. Efforts to partition or allocate the top level goals to features, sequences, or systems must be left to the flexibility of the regulated industry if innovative approaches to achieving safety are to be encouraged. In this regard we believe the conditional goals (large scale fuel melt) of the NUREG-0739 reference discussion goals are not warranted.

Regarding single versus multiple goal forms, it appears appropriate to consider multiple goal forms such as addressing individual, societal, economic, or melt frequency risk limits to address the various damage characteristics under consideration. However, multiple levels of a particular goal form such as the two levels (goal level, and upper limit) of the NUREG-0739 proposal are unnecessary and detract from the desirable characteristics of simplicity and understandability of a safety goal.

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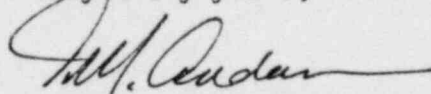
Regarding numerical levels for safety goals, we believe these should be established at levels which are reasonable from the standpoints of being achievable and consistent with other activities involving risks, and defensible from the standpoint that risks to individuals and society as a whole are controlled to be small. The goals proposed by AIF in "A Proposed Approach to the Establishment and Use of Quantitative Safety Goals in the Nuclear Regulatory Process" (May, 1981) achieve these criteria, and we support that document as a viable industry position which NRC should carefully consider in its deliberations to arrive at a safety goal. We also believe that the numerical limits should be as simple as possible to demonstrate compliance, and therefore encourage number limits as opposed to lines or curves. Finally, we consider the NUREG-0739 treatments of risk aversion factors and the distinguishment between early and latent fatality risk goal levels as unnecessary numerical complications to the formation of risk-based safety goals.

With regard to approaches to dealing with uncertainty, we believe that a combination of modelling and data standardization can aid by leading to consistency and predictability. Analyses to show compliance with a safety goal should be performed using realistic assumptions for data and phenomenology. Explicit treatment of uncertainties may be a worthwhile requirement after confidence in the basic application of the techniques is gained.

NUREG-0764 raises a number of interesting considerations with respect to criteria for assessing an approach to a safety goal, characteristics, verifiability, considerations and approaches to safety-goal formulation. We believe it is worthwhile that these have been identified for consideration. However, many of these areas appear to be of a nature that perfect resolution would never be achieved. This should not be permitted to dilute and retard the NRC objective of arriving at a reasoned quantitative safety goal in a timely fashion.

We thank you for this opportunity to comment on the NRC plan and notice in development of a safety goal.

Very truly yours,



T. M. Anderson, Manager
Nuclear Safety Department