Safety Goal Project
(45 FR 71023)

GENERAL ELECTRIC

NUCLEAR POWER

SYSTEMS DIVISION

MFN 108-81
RHB 143-81

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June 5, 1981

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

Attention: Docketing and Service Branch

Gentlemen:

SUBJECT: COMMENT ON FEDERAL REGISTER NOTICE ON DEVELOPMENT OF A SAFETY GOAL (MARCH 26, 1981)

The Federal Register Notice titled "Development of a Safety Goal; Preliminary Policy Consideration", was published on March 26, 1981. In this notice, written comments were requested on the notice itself and NUREG 0764. This letter provides General Electric's comments in response to this request.

General Electric considers that a positive step toward formulation of a safety goal has been taken. The time has come, however, for focusing the discussion not only on the criteria used for selecting a safety goal, but also on the safety goal itself. Selection of a specific safety goal would offer guidance in the various rulemaking processes by establishing a logical basis on which rulemaking conclusions could be founded. In addition, adoption of a safety goal will establish specific criteria for assessing the results of Probabilistic Risk Assessments presently being conducted.

General Electric considers it feasible to establish a safety goal representing the consensus of the nuclear industry's thoughts for use on an interim basis. The values recommended for the various safety goals proposed thus far result in a relatively similar level of safety. Thus, selection of a consensus safety goal form and associated values is more readily made. Selection of an interim goal offers immediate guidance for use in evaluating Probabilistic Risk Assessments and in the upcoming rulemakings. General Electric believes that selection of a safety goal on a consensus basis for an interim period will help expedite the safety goal selection process.

The Federal Register Notice and NUREG 0764 discuss the criteria which could be considered in the formulation of a safety goal. Of these we feel that the following are of particular significance:

- The safety goal form should be quantitative in nature. This would allow an objective assurance that the public health and and safety is being maintained. A quantitative goal would also provide a firm basis for evaluating PRAs and determining their compliance with the safety goals.

- The quantitative safety goal should be simply stated and readily applicable. This would ensure good degree of understanding and will contribute to the acceptability of the safety goal selected. Ease in application should also allow the designer maximum flexibility in reducing risk to the public through either preventive or mitigative means.

- The procedure for determining compliance with the quantitative safety goal should not incorporate conservatism in it's methodology. Probabilistic Risk Assessments should treat uncertainty through a prescribed methodology for modeling and calculations. This would ensure the most realistic results are obtained allowing a reasonable comparison of the risk studies with the safety goal.

General Electric shares your desire for establishment of an acceptable safety goal as soon as possible. We hope that our comments are useful in achieving this objective. Of the safety goals that have been proposed thus far, we believe that the AIF proposal represents a suitable consensus goal. It encompasses the pertinent ideas of the other safety goals proposed thus far while incorporating the particularly important criteria which should be addressed in a safety goal.

We hope that you find the above comments useful in the safety goal process and we would welcome the opportunity to discuss any of them with you. If you have any questions or comments, please contact me at (408) 925-5722.

Sincerely,

R H Buchholz

R. H. Buchholz, Manager
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cc: L. S. Gifford