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Robert L. Mittl
General Manager - Licensing and Environment

Safety Goal Project June 29, 1981
(45 FR 17023)

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

Dear Mr. Chilk:

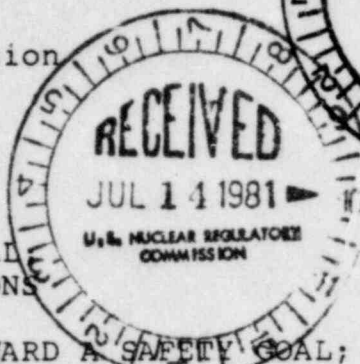
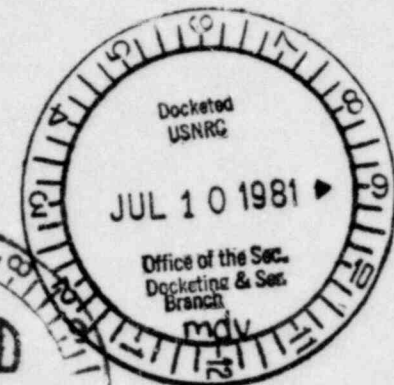
COMMENTS ON
THE DEVELOPMENT OF A SAFETY GOAL
PRELIMINARY POLICY CONSIDERATIONS

- REFERENCE: 1. NUREG-0764 "TOWARD A SAFETY GOAL; DISCUSSION OF PRELIMINARY POLICY CONSIDERATIONS"
2. NUREG-0739 "AN APPROACH TO QUANTITATIVE SAFETY GOALS FOR NUCLEAR POWER PLANTS"

In response to the above subject notice published in the Federal Register on March 26, 1981, the above referenced documents were reviewed. Our review also included the comments and proposed approach submitted to the Commission by AIF.

The development of safety goals is a crucial step toward a rational resolution of unresolved safety issues, as well as the establishment of a licensing basis for continued development of nuclear power. We endorse the AIF proposal since we believe it offers the simplicity and flexibility which will promote acceptance by both industry and regulator.

In addition, we recommend that individual and societal risk limits include a discussion of the statistical distributions and confidence levels used in their evolution. This information, along with specification of acceptable procedures and methodology, will provide a basis for consistent evaluation.



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Acknowledged by card... 7/10/81...mdv

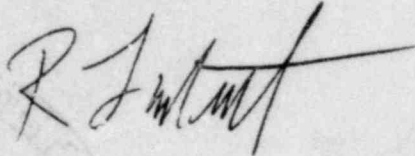
Nuclear Regulatory
Commission

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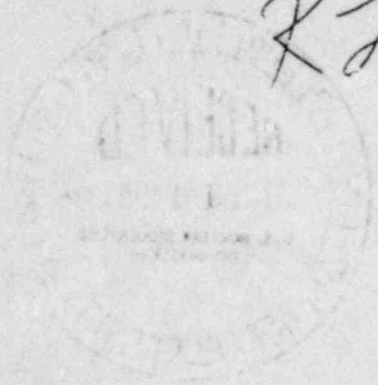
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We appreciate the opportunity to comment on this important issue.

Very truly yours,



R. J. McIntire



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