



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

November 20, 1989

The Honorable Kenneth M. Carr  
Chairman  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Chairman Carr:

SUBJECT: DRAFT SUPPLEMENT NO. 2 TO GENERIC LETTER 88-20, "ACCIDENT  
MANAGEMENT STRATEGIES FOR CONSIDERATION IN THE INDIVIDUAL  
PLANT EXAMINATION PROCESS"

During the 355th meeting of the Advisory Committee on Reactor Safeguards, November 16-18, 1989, we discussed the subject document with the NRC staff. We also reviewed a draft NUREG/CR report entitled, "Assessment of Candidate Accident Management Strategies," that the staff proposes to send as an enclosure with the supplement to the generic letter. We had the benefit of these documents which are referenced. Our Subcommittee on Severe Accidents met on September 20, 1989 to discuss this matter.

We conclude that the information in these two documents will be useful to licensees in the process of performing Individual Plant Examinations, and we agree that the documents should be issued.

The draft NUREG/CR report referred to describes strategies for accident management that are said to be PRA based. However, the report does not include information on the risk reduction that might be attributed to the strategies. This information would be useful to those considering the strategies. We recommend that this information be added if it is reasonably retrievable from existing sources.

We observe that a number of the strategies described in the draft NUREG/CR report either overlap or are very similar to the content of the emergency operating procedures that are either being developed or are already in place in many plants. We believe that labelling these procedures as accident management strategies where others label them as emergency operating procedures is likely to lead to confusion on the part of both the NRC staff and the industry.

Sincerely,

A handwritten signature in cursive script, appearing to read "Forrest J. Remick".

Forrest J. Remick  
Chairman

References

1. U.S. Nuclear Regulatory Commission, "Accident Management Strategies for Consideration in the Individual Plant Examination Process," Draft Supplement No. 2 to Generic Letter 88-20, dated November 8, 1989 (Predecisional)
2. U.S. Nuclear Regulatory Commission, "Assessment of Candidate Accident Management Strategies," Draft NUREG/CR Report (Unnumbered), Prepared by BNL, October 1989