



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

ACRSR-1545

PDR

December 14, 1993

The Honorable Ivan Selin
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Selin:

On several occasions we have written you about the staff devotion to "trigger values" in its effort to assure emergency diesel generator (EDG) reliability in the context of the rule on Station Blackout. We have said that the concept is statistically flawed, and in our last letter that it is categorically impossible to demonstrate the reliability of EDGs using these methods.

The attached response by the EDO seems to acknowledge the error, but states that the staff intends to make changes only in the Generic Letter, but not in the Regulatory Guide, because everyone knows the procedure is wrong. We find that a curious and unsatisfactory response. The EDO can doubtless outlast us, but that is hardly a proper remedy for mathematical error.

The EDO's response appears to suggest that the desire for mathematical rectitude is an unnecessary decoration in nuclear regulation. We disagree.

Sincerely,

J. Ernest Wilkins, Jr.
Chairman

Attachment:

Letter dated October 29, 1993, from James M. Taylor, EDO, to J. Ernest Wilkins, Jr., ACRS Chairman, regarding ACRS concern over "trigger value" approach proposed by Regulatory Guide 1.160

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