

Babcock & Wilcox

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September 3, 1981

Mr. R. B. Minogue, Director
Office of Nuclear Regulatory Research
U. S. Nuclear Regulatory Commission
7915 Eastern Ave.
Silver Springs, MD

Reference: DRAFT REPORT OF NRC FUEL TESTING TASK FORCE, JULY 1981

Dear Mr. Minogue:

The NRC has recently established a task force whose purpose was to evaluate the objectives of the proposed Severe Fuel Damage (SFD) research programs. The stated objectives of the SFD program were to provide the experimental data base and analytical methodology for understanding and predicting core behavior under severe accident sequence conditions. In addition to these objectives the experimental data base was to be produced within the time constraints established by the associated rulemaking hearings.

Representatives of B&W have reviewed the referenced report as part of a peer review group. Their detailed technical comment will be sent to the NRC Staff under separate cover. However, we feel the need to comment on the objectives of the program. The objectives of the SFD program appear to initiate an expensive experimental program prior to the assessment of the need for such data. We concur with the ACRS recommendation referenced in the task force report. That is, the basic orientation of the NRC safety research program should be shifted from overemphasis on confirmatory research to a substantial effort in research intended to improve nuclear power safety by assisting in the resolution of identified safety concerns. However, the task force report states that rules will be made based upon the current safety data base and that the perceived role of SFD in rulemaking is to provide verification, confirmation, of rulemaking actions with the major impact of the program being on post rulemaking activities (rule implementation).

RES Files	R2411
Subject File No.	
Copy To PDR	<input checked="" type="checkbox"/>
Task No.	HS
Research Request No.	
FIN No.	
NUREG No.	0840
Docket No.	
Rulemaking No.	
Other	
Return NRC-318	
to RES, Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	

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Mr. Robert B. Minogue

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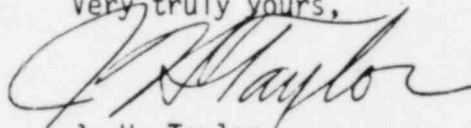
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It is our recommendation that the need for the information and the understanding of how it will be applied should be developed prior to initiating an elaborate and expensive experimental program. The R&D data requirement for severely damaged fuel should be developed based on criteria related to the (1) use of data, (2) benefit to the nuclear industry, (3) timeliness, (4) practicality, (5) cost, and (6) priority. Once these data requirements are defined, a peer group should review the program which seeks to obtain the specific data.

In this particular case we find the task force plans call for obtaining data before the need for the program has been established and therefore we believe the program is missing a very important element.

If you have any comments or questions please feel free to contact me on Ext. 2817.

Very truly yours,



J. H. Taylor
Manager, Licensing

JHT/fw

cc: Dr. T. E. Murley, Director, Division of Safe. Tech.
Mr. G. A. Arlotto, Director, Div. of Engrg. Tech.
Mr. R. B. Borsum - B&W Bethesda, MD. office