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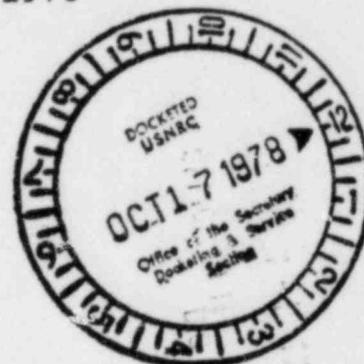
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October 16, 1978

Joseph Hendrie, Chairman
Victor Gilinsky, Commissioner
Richard Kennedy, Commissioner
Peter Bradford, Commissioner
John Ahearne, Commissioner
U.S. Nuclear Regulatory Commission
1717 H Street, N.W.
11th Floor
Washington, D.C. 20555



Gentlemen:

I have been informed that, in connection with your consideration of NUREG/CR-0400, the "Lewis Report," the Commission has requested the Staff to provide it with a report on all instances in which WASH-1400 has been used in the licensing and regulatory process. Therefore, I am enclosing for your interest a copy of a brief filed today by the Union of Concerned Scientists with the Appeal Board which deals with exactly such an instance.

In our experience, such an explicit and direct incorporation of WASH-1400 absolute probability figures is fairly unusual. Generally, the Staff is more circumspect. Another such instance, however, is provided in the Staff's position in response to the UCS Petition for Emergency and Remedial Action which is presently before you for reconsideration on that precise point, among others.

The Staff appears to use WASH-1400 most directly when confronted with a newly-declared safety problem or an unresolved safety problem, both of which at least prima facie call in question the integrity of operating reactors. In those cases, the "interim" operation of reactors pending analysis and resolution of the safety problem can conveniently be based on probabilities derived either explicitly or otherwise from WASH-1400. The Brown's Ferry Review Group presents another case in point.

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