

NUCLEAR REGULATORN C MMISSION ADVISORY COMMITTEE ON REACTOR SAFEGUARDS WASHINGTON D. C. 20555 CEDUERY 11, 1983

ATTACHMENT 3

Honorable Nunzio J. Palladino Chairman U.S. Nuclear Regulatory commission Washington, D.C. 20555

Dear Dr. Pilladino:

SUBJECT: ACRS REPORT ON THE PROPOSED GENERIC SAFETY ISSUES PRIORITIZATION METHODOLOGY

During its 273rd meeting, January 6-8, 1983, the ACRS reviewed the methodology described in NUREG-0933 that is proposed to aid in establishing priorities for resolving generic safety issues. This matter was also ciscussed by the ACRS Subcommittee on Generic Items during the Subcommittee meetings on December 8, 1982 and January 5, 1983.

The approach described in NUREG-0933 seems logical. However, very large uncertainties in the application of the approach exist. These uncertainties are primarily in: probabilities related to a sequence of events associated with a specific safety issue and their consequences, and projected methods for and costs of resolving the safety issue (staff resources, research, licensee resources, implementation time, etc.). If this approach is to be used responsibly to allocate NRC and licensee/applicant resources, the data on which judgments are made must be adequately validated. In addition, it is essential that internal peer review be employed effectively at appropriate stages, including the initial application of the value-impact score formula

Because of the above mentioned uncertainties, we believe that considerations other than those treated in the approach described in NUREG-D933 may have a major influence on the final priority grading of many of the generic safety issues. We will continue to review and comment on the adequacy of the methodology and its application to the individual generic safety issues at appropriate intervals.

> Sincerely, J. J. Ray Chairman

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Reference: U.S. Nuclear Regulatory Commission, "A Prioritization of Generic Safety Issues," NUREG-0933, Revision O (Draft), <u>dated Nove</u>mber 10, 1982.