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October 1, 1982

The Honorable Nunzio Palladino  
Chairman  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Chairman:

I am writing in regard to Mr. Bender's recent comments concerning the use of Probabalistic Risk Assessment (PRA).

These comments were attached to the ACRS September 15 letter to you discussing safety goals. Mr. Bender said:

The PRA methodology stems from the Reactor Safety Study, WASH-1400. The well established "inscrutability" of the WASH-1400 results was primarily a consequence of the thin and generally unvalidated data base used to establish the event probability. These data from WASH-1400 are still being used in PRA's with very little discretion concerning their validity. Hardly any new data are available.

....

The claims for PRA concerning its ability to assess public safety risk are little more than a sham that will hide the fact that the basis for safety will always depend upon the judgement of a few individuals.

Mr. Bender's comments are consistent with the Commission's January 21, 1979 statement in response to the report submitted by the Risk Assessment Review Group wherein the Commission stated:

.... in light of the Review Group's conclusions on accident probabilities, the Commission does not regard as reliable the Reactor Safety Study's numerical estimate of the overall risk of reactor accident.

In recent years the NRC staff seems to have used PRA's in a manner inconsistent with the Commission's 1979 statement.

October 1, 1982

In view of the discrepant expert views of the ability of PRA to provide reliable estimates of the risk associated with operation of nuclear reactors, I would appreciate an answer to the following questions:

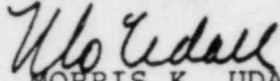
Has the Commission's position changed from that stated on January 18, 1979?

What is the basis for any such change?

What is the Commission's position concerning the specific criticisms of PRA stated by Mr. Bender on September 15?

Thank you for your assistance.

Sincerely,

  
MORRIS K. UDALL  
Chairman