

Commonwealth Edison One First National Plaza, Chicago, Illinois Address Reply to: Post Office Box 767 Chicago, Illinois 60690

February 1, 1983

Honorable Nun .o J. Palladino, Chairman U.S. Nuclear Regulatory Commission 1717 H Street, NW Washington, D.C. 20555

Dear Chairman Palladino:

On behalf of the IDCOR Program, we wish to express strong, nuclear industry support for, and urge the Commission to adopt, the Policy Statement on Severe Accidents proposed under SECY Memorandum 82-18.

The IDCOR Program directly represents the interests of a broad range of industry participants in regard to the Commission's consideration of severe accidents in its regulatory process. The IDCOR Program's purpose is to develop in an expeditious marner a comprehensive, integrated, technically sound position to assist in determining whether changes in regulatory requirements, if any, are needed to reflect severe accident considerations. The technical program which forms the basis for our technical position has been underway since early 1981, and we expect to complete these technical efforts in July, 1983.

Over the past two years, we have worked closely with your staff to assure that our respective views and technical information are exchanged in a timely manner, and to urge that a decision process be adopted to facilitate timely and permanent resolution of all key technical and regulatory issues before mid-1984. We believe that the SECY 82-1B Policy Statement establishes the appropriate framework for timely decision-making on severe accident issues, and we believe that its adoption is an essential step toward achieving long-term stability in the regulatory process.

The Policy Statement includes the following elements which we believe are imperative for proper resolution of severe accident issues:

- a. Completion of IDCOR studies by mid-1983, counterpart NRC Staff technical studies by early 1984, and resolution of technical and regulatory issues by mid-1984.
- b. Generic decision-making on severe accident issues; new designs through a standardized design rulemaking process; and existing operating reactors and near-term operating and license and construction permit applications through a generic decision-making process, which (depending on the outcome of the IDCOR and NRC studies) may or may not require rulemaking for implementation of decisions.

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> c. A balanced perspective on the respective roles of accident prevention, mitigation, and management, consistent with the result of our work and the existing body of risk studies on current generation designs.

Our work to date gives us considerable confidence that major design changes or new broad-scale regulatory requirements will not be required. At the same time, we remain open minded, and we believe that the results of the IDCOR Program will expand our insights into the important technical issues relating to severe accidents. These studies and those of the Stiff, however, cannot be used effectively unless they are considered in a rational, efficient, generic decisionmaking process which assures prompt and permanent closure of severe accident issues. We believe that the SECY 81-2B Policy Statement provides the correct vehicle for that purpose, and we urge you to adopt it.

Yours truly,

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Cordell Reed Chairman IDCOR Steering Group

CC:

Commissioner Victor Gilinsky Commissioner J. Asseltine Commissioner John F. Ahearne Commissioner Thomas Roberts William J. Dircks Executive Director for Operations

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IDCOR Steering Group

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