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Mr. Samuel J. Chilk, Secretary
U. S. Nuclear Regulatory Commission
Washington DC 20555

Dear Mr. Chilk,

I have been away from the NRC side of the nuclear industry for over ten years. In a recent re-visit, I find continuation of a mind-set that seemed so unreasonable in the past: The "ratchet."

I recently read a long discussion of problems industry is having with proclamations from the NRC. (Letter, "Industry Comments on Draft "Regulatory Analysis Guidelines for the U.S. Nuclear Regulatory Commission," NUREG/BR-0058, Revision 2," to S. J. Chilk [NRC] from W. H. Rasin [NUMARC], dated November 30, 1993.)

I was appalled at what this letter and its attachments showed: Like in the 70's and 80's, the NRC still pursues ever-tightening regulatory requirements regardless of the benefit or cost. And to make matters worse, NRC has found it necessary to delve into areas far beyond its charter or expertise: Societal benefit and utility management.

When I dealt with the NRC (for over twenty years), I always seemed to be in a game of "one-up-manship." Every time I responded to a regulation, a new interpretation required more information and analysis, which led to more questions, more interpretation, more regulations, more information, and so on, and so on, ratchet, ratchet, ratchet. A case in point is the wide, wild, knee-jerk requirements stemming from the apparent causes of the TMI-2 accident that demanded instant, excessive, debilitating changes to the plants.

However, over the years, common sense and logic occasionally came to the fore. With time, someone said "stop," and the questions that were answered actually did reaffirm the real, rather than the perceived benefit of the proposed requirements. Some measure of technical sanity returned and we all recovered from TMI.

But the NRC never quit. Although slowed from the "thou shalt instantly respond" mode, the Staff continues today to search for and invent new ways to demand tribute from the utilities.

I feel the whole attitude is a "full employment, protect my job" activity, and always has been. One would think that with virtually all US nuclear plants being of designs over twenty years old, that all of the real safety issues would, by now, have been identified and addressed. Yet, in the name of safety, decrees continue to flow from the NRC's towers as fast as they did when the designs were new.

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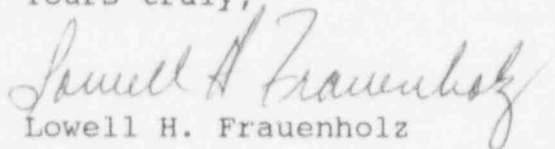
In the old days, I thought this tactic was deemed necessary by the NRC because the Staffers felt - probably correctly - that if they didn't keep dreaming up new problems, they couldn't show they were working, and their jobs would have disappeared. Only now the dreaming process is a lot tougher. We've gone by ATWS, and degraded core, and beyond-design-basis, and design reconstitution, and how many others those brilliant dreamers have conjured up. But they are running out of ideas! So now they move into new realms not constrained by the rigid laws of physics that govern engineering. Now they - you - are moving into the mushier disciplines of sociology and economics.

It's time you looked at your past, present, and future. I mean really look. Step back. Study your world. You will surely see that you need to modify how you interpret your charter. You will see the need to move away from the "ratchet" of dreaming up new problems that require new regulations that require new designs and new hardware, and new surveillances and new.....

Why not go into the "keep it safe" mode? That's where you work with what exists at these over-twenty-year-old plants, and strive to keep everything healthy and running right. You spend a lot of time and money doing this already, so why not make it your prime directive? It's time to stop trying to make the plants better, time to simply keep what's good. Get rid of the dreamers, those technical doom-sayers, and replace them with those who recognize how to keep a good thing good.

Then the rest of us out here in non-NRC land can reap the benefit of safe, economical, efficient power production, and everyone's life will be better, including yours.

Yours truly,


Lowell H. Frauenholz