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P.O. Box 224, Stone Ridge, New York 12484

March 7, 1983

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Prof. William Kerr  
Advisory Committee on Reactor Safeguards  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Dr. Kerr:

In response to your request at the CATAWBA ACRS Subcommittee meeting of March 4-5, 1983, I would like to provide the following commentary on the seismological presentations. I will confine my remarks to the Charleston, South Carolina earthquake issues since I view that as the critical issue for this plant and other plants in the eastern United States. This subcommittee meeting provided me with the first opportunity to review the Staff positions and actions following the USGS 'clarification' letter.

1. The Staff position appears to be that no changes in licensing procedures should result from the USGS clarification pending the completion of the short term probabilistic studies and the long term deterministic studies outlined in the memorandum from Vollner to Denton dated March 3, 1983. Although I am a strong advocate of the necessity of the research programs, I disagree with the Staff position for the following reasons:

a. The Staff feels that some of the hypotheses regarding the causative mechanisms of the Charleston earthquake "could be very restrictive in location". Although that might possibly be true, in a strict Appendix A sense, for one of the many hypotheses, it is not a valid point from a scientific viewpoint.

b. The Staff position is that the deterministic studies scheduled for completion in 1985 of the proposed research program "should reduce the uncertainty...". Given the results of the first eight years or so of this program, I am not so optimistic. In fact, barring an unforeseen breakthrough, our uncertainty may significantly increase. The ACRS should provide evaluations and recommendations regarding the proposed deterministic program.

c. The Staff indicates that the LLNL probabilistic studies "will take into account existing uncertainties". As a participant in that program, I do not understand how it will consider alternative locations for the Charleston earthquake or the probability of a large earthquake occurring in other parts of the eastern United States unless that is explicitly delineated in the zonation by one of the "experts". Since the "experts" realize the uncertainties involved, most will not suggest an appropriate delineation.

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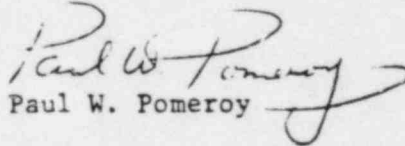
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Overall, while the research plans constitute an important part of the program, I believe that they also allow a postponement of the consideration of the fundamental premises of the licensing process for three years in the hope that the proposed programs will produce a definitive result. In my opinion, this approach is unfair to all the parties involved and the issues should be examined now.

Specifically for the CATAWBA site, I would recommend to the subcommittee that the Charleston seismic issue be held as an open item pending examination of the generic issue and the Staff position by the Extreme External Phenomena Subcommittee and/or the full committee. Both the U.S. Geological Survey and the Staff have expressed a desire to meet with the ACRS to discuss the issue and clearly, the Staff would benefit from the guidance of the committee in this area and from committee commentary on the proposed research program. I feel that the committee should play an active leadership role in the resolution of this problem. Action is required in a relatively short time frame. If it is proper to send a copy of this letter to Dr. Okrent, I would appreciate you doing so to communicate to him the urgency that I feel regarding the Charleston situation.

Thank you for asking me to participate in the CATAWBA Subcommittee. As always, it provided a highly stimulating forum and I hope that the site's specific problem can be resolved in a rapid and satisfactory manner.

Sincerely yours,

  
Paul W. Pomeroy

PWP:gla

cc: Mr. R. Majors, ACRS Staff