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plants where the vessel properties are calculated to exceed the screening criterion before the end of plant life.

Additional comments were provided by ACRS member David Okrent, who generally supports the ACRS recommendations. In addition, Dr. Okrent recommends that the probabilistic studies be improved and subjected to extensive review. We agree, and have so provided in our recommended Long Term Action No. (2). Dr. Okrent's comments on the staff's analysis relative to the Draft Safety Goal are largely taken into account in the rewritten analysis, Section 8.5, in the staff report in Englosure A. Dr. Okrent disagrees in the use of 10 per reactor-year for PTS because of the large number of potential initiators of core melt and the large uncertainty in probabilistic PTS analysis. The staff has nevertheless retained 10 in its Safety Goal analysis, but the results of that analysis suggest that the PTS core melt frequency is in fact lower than 10.

The Committee to Review Generic Requirements (CRGR) reviewed the PTS issue and the staff's September 13, 1982 draft technical evaluation at meetings on October 6, 1982 and October 28, 1982. The minutes of the CRGR meetings are provided as Enclosures F and G. On the basis of discussions at the CRGR meetings and the meeting minutes, the staff believes that the revisions we have made to the staff technical evaluation (Enclosure A) and the actions proposed in this paper are responsive to the CRGR recommendations.

RECOMMENDATIONS:

We recommend that the Commission:

- Rulemaking that would establish an RT_{NDT} screening criterion, require licensees to submit present and projected values of RT_{NDT}, require implementation of such flux reduction programs as are feasible and needed to avoid reaching the screening criterion, and require plant-specific PTS safety analyses when plants are within three calendar years of reaching the screening criterion;
- (2) Direct the staff to prepare an Order to Show Cause why the license for H. B. Robinson Unit 2 should not be modified to require the licensee to submit a comprehensive plan to provide adequate protection for PTS.