



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D. C. 20555

10-19-90

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October 5, 1990

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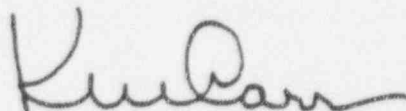
MEMORANDUM FOR: Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick

FROM: Kenneth M. Carr

SUBJECT: NEPA REVIEWS FOR DESIGN CERTIFICATION

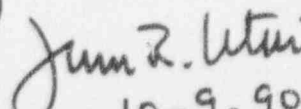
In discussions with staff concerning their preparations for design certification review, a potential obstacle to rendering a final decision on designs was identified. If the scope of NEPA review being performed for a design to be certified does not include severe accidents in accordance with the dictates of the Limerick decision, then there is the potential for litigation and review of severe accident mitigation design alternatives (SAMDA) at the CP or combined license stage. The staff has underway several reviews which address severe accidents, i.e., the GEIS on license renewal and the study of decouple siting criteria for Part 100. However, so far as I am aware, no specific effort is being directed toward identifying the appropriate scope of severe accident reviews for NEPA purposes for a design certification. I propose that we direct the staff to assure that, as part of their ongoing efforts for design certification, they incorporate the necessary and appropriate NEPA review of potential severe accident mitigation design alternatives for the design to be certified. In this connection, staff should explore potential concepts for defining "remote and speculative."

SECY, please track.

  
Kenneth M. Carr

cc: J. Taylor, EDO  
W. Parler, OGC  
S. Chilk, SECY

I agree that we need to get going on addressing this question.

  
10-9-90

A20 LWR  
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