

11-10-82

MEMORANDUM FOR: Dr. David Okrent, Member
Advisory Committee on Reactor Safeguards

FROM: Stephen H. Hanauer, Director
Division of Safety Technology
Office of Nuclear Reactor Regulation

SUBJECT: SECY-82-413, "FORTHCOMING RISK COMPARISON STUDY OF
ELECTRICITY GENERATING ALTERNATIVES"

Your note of October 29, addressed to Mr. Dircks, about the forthcoming report of the CONAES Risk and Impact Panel, has been referred to me.

Your note is appreciated. We shall bear your comments concerning limitations of the Panel's study in mind in the NRC staff review of the Panel report, and we shall call your comments to the Commission's attention.

We do not know at present what the Commission's intentions will be with respect to the use to which risk comparisons with alternative technologies will be put. Those intentions will undoubtedly be influenced by whether the Commission will ultimately decide to retain the comparison to alternative technologies that is now a part of the proposed NRC qualitative safety goals.

Meanwhile, we would appreciate any insights that you may wish to contribute about the significance of the CONAES risk comparison's limitations for NRC's purposes. We would welcome your views on such questions as:

- (a) Does the CONAES Risk and Impact Panel study represent a reasonable attempt at comparison, considering qualitative differences in risks and inexact knowledge?
- (b) What are the major weaknesses and uncertainties? How seriously do they detract from comparability? To what extent could they be reduced by further efforts?

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- (c) What major studies do now exist, beyond what the Panel had considered, that would substantially alter risk-comparison judgments?

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Stephen H. Hanauer, Director
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Office of Nuclear Reactor Regulation

cc: W. Dircks, EDO
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