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PDR 060983

May 2, 1983

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

Dear Dr. Kerr,

Pursuant to your request at the termination of the ACRS Sub-committee meeting on Class 9 Accidents on Apr. 26, 1983, I am pleased to submit the following comments on the IDCOR and NRC Severe Accident Research Program:

1. IDCOR-I feel the IDCOR program is a worthwhile endeavor which should have positive and long lasting results. Probably its most valuable aspect is the knowledge and perception it should provide to utilities regarding the likelihood, progression, consequences, and management of Class 9 accidents. This benefit will be enhanced if there is appropriate and continuing interchange between IDCOR contractors and member utilities. (This, as I recall, was the thrust of one of your comments during the meeting.)

The success of IDCOR in terms of providing "closure" on severe accident issues and developing a definitive and defensible position on risks and the need for severe accident mitigation remains to be determined when final reports are available. I am personally skeptical that IDCOR will be able to successfully resolve some important, even pivotal, severe accident issues on the current schedule. These include containment integrity (limits of), radionuclide source term, and external events. The IDCOR premise in this regard is contrasted with NRC's position (embodied in NUREG-0900) which argues for extensive research in order to resolve these same issues.

2. NRC Severe Accident Research Program- I have felt for some time that the NRC SARP suffers from lack of sufficiently strong centralized management, insufficient coordination, overlap of efforts, and lack of a prioritization structure. The program is a vast, com-

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plex undertaking. Such an endeavor demands close attention and a well defined focal point with interrelationships clearly established. I don't perceive these prerequisites in the NRC program. Part of the problem is (and will continue to be) diversions and distractions continually imposed on the NRC by events beyond their control which require immediate attention. I note that both IDCOR (Ref. 1) and NRR (Ref. 2) have recently expressed similar concerns. Perhaps the management of the program should be undertaken by an outside organization or group which would not be exposed to diversions and distractions, any who could bring competent and objective management to the program. At least it seems to me that an outside group should take an in-depth look at the need for and management of the program. I personally feel that some significant elements of the SARP go beyond the responsibility and mandate of the NRC and should be the responsibility of industry.

3. Use and Interpretation of Safety Goals- During the Apr. 26 meeting of your subcommittee, Bob Bernero made reference to "trial use" of the safety goals, and use of them in conjunction with PRA in evaluating research needs and results. While I don't have any particular problem with this approach, it seems to be in conflict with the views of others in NRC. NRR in Ref. 2 states that "There should be no reference (in NUREG-0900) to the NRC safety goals. This would be in keeping with the Comissions recent decision to promulgate the goals for a two-year period of evaluation rather than trial use". Further, during the Apr. 13 ACRS Subcommittee meeting on reliability and probabilistic assessment, Tom Murley made the statement that the safety goals were not to be used (during the 2-yr. evaluation period) as even a contributing factor in NRC decisions.

I hope these comments are of some use to you and the ACRS. I wish also to take this opportunity to commend ACRS staff members Don Bucci and Alan Wang for providing appropriate documentation along with very useful and incisive summaries and comments. Their effort was particularly welcome in view of the rather extensive documentation which this complex issue has thus far produced..

Sincerely,

P. R. Davis

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REFERENCES:

1. Letter, Terry Tyler, TEC, to Dr. John Larkins, NRC, Sept. 17, 1982.
2. Memo, Harold Denton to Robert Minogue, NRR Review of Severe Accident Research Plan, Apr. 20, 1983.

cc: Don Bucci, ACRS
Alan Wang, ACRS