NOTATION VOTE

RESPONSE SHEET

TO:	John C. Hoyle, Se	ecretary	
FROM:	CHAIRMAN JACKSON		
SUBJECT:	SECY-96-128 - POI ISSUES PERTAINING STANDARDIZED PASS	TO THE WES	TINGHOUSE AP600
Approved X (w/comments) Disapprove	d	Abstain
Not Participating Request Discussion _			scussion
COMMENTS:			
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Release Vote / Y / November 15, 199			
Release Vote / X /		DATE	
Withhold Vo	te //		
Entered on	"AS" Yes X No	Alastic Control State Control	

Chairman Jackson's Vote on SECY-96-128, "Policy and Key Technical Issues Pertaining to the Westinghouse AP600 Standardized Passive Reactor Design"

For the issues approved by the Commission, OGC should include language in the design certification rulemaking which assures that the level of safety associated with Commission approved positions be maintained during the life of the certification (and renewals).

Prevention vs. Mitigation of severe accidents

I approve the staff's recommended position as stated in their revised clarification paper of November 12, 1996, and as approved by ACRS in its letter dated August 15, 1996.

Based on the uncertainties associated with the reliance on passive systems in mitigating severe accidents, and the advantages of having operator intervention as part of the design's accident mitigation features -- additional system(s) for accident management and long term mitigation is prudent.

Approval of this position is additionally based on the staff position (as stated in the November 12, 1996 paper) that direct credit for such additional system(s) would not be granted in evaluating design basis accidents.

Additionally, I approve staff <u>consideration</u> of the use of realistic passive natural fission product removal coefficients contingent upon inclusion of the additional system(s) for severe accidents. I do not consider this an inappropriate "link" between design and severe accident criteria, because the staff is basing their consideration of more realistic removal coefficients on the fact that uncertainties regarding the performance of passive safety systems are reduced with the additional system(s).

I am discouraged that this issue could not be satisfactorily resolved between the staff and the vendor. It is apparent that the staff has used arguments for both short and long term accident mitigation to justify an additional system(s). However, I understand the staff's reluctance to accept the larger uncertainty levels, with current state-of-the-science, for evaluating the effectiveness of natural removal processes.

Should the vendor choose to do the additional testing necessary to reduce the uncertainties associated with passive fission product removal systems (e.g., fan coolers), the staff should continue its independent assessment and review of the systems.

Post-72 hour actions

I approve the staff's position that the site be capable of sustaining all design basis events with onsite equipment and

supplies for the long term. After 7 days, replenishment of consumables such as diesel fuel oil from offsite suppliers can be credited.

External Reactor Vessel Cooling

I approve the staff's position that Westinghouse use a balanced approach, involving reliance on in-vessel retention of the core complemented with limited analytical evaluation of ex-vessel phenomena, to address the adequacy of the AP600 design for exvessel events.