

Washington Public Power Supply System

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OFFICE OF PUBLIC
CONTACT & SERVICE
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October 7, 1985

Mr. Denwood F. Ross, Deputy Director
Office of Nuclear Regulatory Research
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Ross:

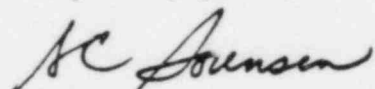
Subject: Review and Comment on NUREG-0956

The Washington Public Power Supply System has reviewed NUREG-0956
"Reassessment of the Technical Bases For Estimating Source Terms".

We are encouraged by the results of this reassessment in conjunction with the industry's IDCOR effort, and recommend that the NRC continue efforts to identify appropriate areas to apply these results. The reassessment of source terms has the ability to save ratepayers millions of dollars with no reduction in the level of protection afforded public health and safety.

Specific comments from our reviews are provided in the attachment.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

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ATTACHMENT

- 1) As noted throughout the document and particularly in Chapter 8, Conclusion 8, "Source terms were found to depend strongly on plant design and construction details, thus making development of useful Generic Source terms difficult." Examples of such plant specific features that were considered in NUREG-0956 would be the use of a certain kind of concrete, the shape of the reactor cavity and the routing of ECCS piping in PWRs. Other plant specific features not mentioned in the NUREG, but which could impact the source term results would be such things as the effect that the containment sump area geometry has on turbulence, flow rates and deposition rates; the surface area available for deposition is likely to be much higher than assumed due to the presence of cable trays, cable, piping, instrument lines, various kinds of equipment and supports, etc.

This conclusion should hardly be considered surprising and certainly should not be construed as an impediment to usage of the new methodology in the regulatory arena. The Commission noted in the supplementary information accompanying its recently published "Policy Statement on Severe Reactor Accidents" that this effort is just one part of a larger program which will, by design, account for plant specific contributions to risk. Plant specific features which contribute to the difficulty apparent in developing Generic Source terms need to be addressed primarily through such efforts as the QUEST studies, etc., which are ongoing.

The logical course in addressing this issue would be to use the approach followed by the industry in the IDCOR program.

- 2) Improved understanding of equipment failure rates and event initiators could shed significant light on risk assessments, since risk is defined as frequency multiplied by consequences. Both the Reactor Safety Study (WASH-1400) and NUREG-0956 concentrate on consequences, which is appropriate given the nature of the regulatory climate. However, in the application of such research one must look at both sides of the equation. Cost benefit analyses which begin with severe consequences and an assigned probability of occurrence set at an artificially high value, not reflective of reality, does not serve the goal of providing a more coherent technical and scientific basis for regulation.
- 3) The logical place for NRC to begin testing this new methodology would be in the preparation of new and/or revised value/impact assessments for use in prioritization of safety issues in NUREG-0933. This would provide not only a comparison of the effect of the differing methodologies in a regulatory environment but would also allow an alternate assessment of the utilization of staff resources. Revised safety issue prioritizations of HIGH, MEDIUM, LOW, and DROP, based on new and improved analytical methods would contribute to improved agency management of scarce resources, minimize the impact to industry from overreaction by NRC to issues of negligible safety importance, and focus NRC and industry efforts on those issues which are truly significant in terms of public health and safety.