



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
ADVISORY COMMITTEE ON REACTOR SAFEGUARDS  
WASHINGTON, D. C. 20555

December 15, 1981

Mr. Jerry D. Griffith, Acting Director  
Office of Nuclear Power Systems  
Office of Nuclear Energy  
Department of Energy  
Washington, DC 20545

SUBJECT: ACRS REPORT ON THE FINAL DRAFT OF THE DEPARTMENT OF ENERGY'S RESPONSE  
TO PUBLIC LAW 96-567

Dear Mr. Griffith:

During its 260th meeting, December 10-12, 1981, the Advisory Committee on Reactor Safeguards reviewed the final draft of the Department of Energy (DOE) response to Public Law 96-567, "Nuclear Safety Research, Development, and Demonstration Act of 1980." A meeting of ACRS Working Groups was held in Washington, D.C. on December 9, 1981 to consider this matter. During its review, the Committee had the benefit of discussions with representatives of DOE and the NRC Staff. Our general comments on the final draft response to Congress appear below.

I. Assessment of the Need for and Feasibility of Establishing a National Reactor Engineering Simulator Facility

We believe that our comments, as contained in our September 16, 1981 report on the first draft of the DOE response to Public Law 96-567, have been adequately considered by DOE. While we agree that a national simulator facility is not justified, we believe that a cohesive national light water reactor systems simulation program should be considered by the Simulation Working Group organized by DOE.

We recommend that the Simulation Working Group define early in its deliberations the uses which it believes to be appropriate for simulation. The results of this effort should be available before much is done toward the development of a program.

II. A Study of the Desirability and Feasibility of Creating a Federal Nuclear Operations Corps

Although we believe that our comments relating to the desirability and feasibility of creating a Federal Nuclear Operations Corps have been adequately considered by DOE, and although we concur with the conclusion that such a Corps is not needed, we want to offer several comments.

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The current draft of the report states that the "Nation's academic and nonacademic institutions, outside the nuclear industry, have a large and expandable capability in place to provide training in nuclear fundamentals and to augment specific training by utilities." While this may be true, we believe it is important to recognize that this capability, particularly in terms of graduate education in nuclear engineering and radiation protection, has been declining in recent years. There is no assurance that the necessary resources and students will be available to enable the existing training capability to be fully utilized. Similarly, we believe it is overly optimistic to state that the "Institute of Nuclear Power Operations (INPO) has outlined an overall plan for an industry-wide program to provide adequately trained personnel to perform operational and supervisory functions." While commendable, the INPO plan, unless modified, appears to us to be capable of providing only a portion of the total number of people that will be required. We believe the report should acknowledge these deficiencies as well as the need to take action to correct them.

III. Program Management Plan for the Conduct of a Research, Development, and Demonstration Program for Improving the Safety of Nuclear Power Plants

The Program Management Plan is unchanged from that in the first draft of the report. We continue to believe that it constitutes an appropriate and potentially successful approach to the development and execution of a research, development, and demonstration program for improving the safety of nuclear power plants.

Such a program has not been developed. However, Working Groups with representation from industry, NRC, and DOE have been established in the several areas addressed by the Act. These Working Groups have been meeting to identify issues and plan to develop National Programs in each area and recommend measures for their implementation. We believe that this approach is an acceptable way to develop meaningful programs with appropriate participation by the various organizations.

We wish to be kept informed of the efforts of DOE and its various Working Groups related to the implementation of Public Law 96-567.

Please let us know if we can be of further assistance.

Sincerely,



J. Carson Mark  
Chairman