

ADVISORY COMMITTEE ON REACTOR SAFEGUARDS
UNITED STATES ATOMIC ENERGY COMMISSION
WASHINGTON 25, D. C.

May 14, 1962

Honorable Melvin Price, Chairman
Subcommittee on Research, Development
and Radiation
Joint Committee on Atomic Energy
Congress of the United States
Washington, D. C.

Dear Congressman Price:

During our appearance before the Joint Committee on Atomic Energy, on April 10 and 11, Dr. Thompson and I were asked several questions about the speed with which the Advisory Committee on Reactor Safeguards deals with its cases. Our answer, given in general terms, was that the ACRS has no backlog of cases under review--that we ordinarily give our advice on a case well within one month after receiving the pertinent technical information in the form of hazards reports and AEC staff analyses. I realize that the general problem of scheduling safety reviews has become rather controversial within the nuclear reactor industry but feel that part of the problem arises because of a genuine misunderstanding of the ACRS's role in this process. It occurred to me that you might find it useful to have available a slightly more detailed summary of ACRS procedures than it seemed appropriate to present during our oral testimony.

The Atomic Energy Commission normally provides the ACRS with hazards summary reports and related safety documents shortly after receiving them from an applicant. The timing on this varies considerably from case to case, but can be as much as two to three months or more in advance of the date when ACRS advice is given. The documentary information is then reviewed in parallel, by the AEC Regulatory Staff and the ACRS. As you know, there may be an ACRS subcommittee meeting, in which the AEC Staff participates, during this period, although this is in no sense a mandatory part of our procedure. The staff reviews the case during the same period, and communicates its opinion to the ACRS in the form of a written staff analysis. Following this there is the presentation by the applicant during an ACRS meeting, after which a letter of advice is written.

From the ACRS's standpoint, the timing of the above stages of our safety review is controlled entirely by two internal arrangements that we have set up with the AEC staff; our 30-day, and 15-day rules. The 30-day

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rule states that in order for a case to be eligible for consideration at an ACRS meeting, the documentation submitted by the applicant (i.e., hazards summary report, etc.) must be received by the ACRS at least 30 days in advance of the date of the meeting. The 15-day rule states that the AEC staff analysis on a case must be received at least 15 days in advance of the meeting date. Since, as pointed out by Dr. Thompson in his testimony, the amount of hazards documentation in some cases is quite extensive, and in all cases is considerable, these ground rules were set up in order to try to provide Committee members with a reasonable period in which to digest the mass of technical information involved. I might point out, in passing, that the Committee's interpretation of these "rules" has always been extremely liberal, and exceptions have freely and frequently been made in order to expedite hazards reviews.

The Committee ordinarily regards the AEC staff analysis as the final portion of the formal documentation that it receives on a case; receipt of this document normally signifies that the staff has finished its analysis and has taken a position, although this position often involves some questions or reservations. The staff analysis is desired some time prior to an ACRS meeting since it helps to focus Committee attention on those areas of design which are new or unusual, or incompletely developed.

If the ACRS has had a backlog of cases, and if this has acted as a bottleneck in the regulatory process, you can see that this would be apparent in the lengths of time that have elapsed between receipt by the Committee of the AEC staff reviews and the times when our letters of advice to the Commission were submitted. Since a letter of advice is ordinarily submitted within three or four days after the meeting date at which an applicant makes his presentation to the Committee, the 15-day rule would seem to require an elapsed time of roughly 20 days between receipt of the staff analysis and the Committee's letter of advice.

Prompted by the Joint Committee's interest, we have tabulated this elapsed time, for the 66 Committee actions on 44 unclassified reactor projects actually considered by the ACRS during the Calendar Years 1960 and 1961. We find the following result:

<u>Total Number of Actions, 1961 and 1962:</u>	- 66
<u>Elapsed time:</u>	
	1 week or less - 23%
	2 weeks or less - 36%
	3 weeks or less - 91%
	1 month or less - 98%
	more than 1 month - 2% (1 case)*

* In the case of review of Core II of the Pressurized Water Reactor (Shippingport) the Committee did not furnish advice until after a planned visit to the site by the full ACRS. It was our understanding in this instance that an elapsed time of 2 months would not cause any delay in project planning or fabrication.



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In the above tabulation, "elapsed time" refers to the actual time between the receipt of the staff analyses by the ACRS, and the submittal of the ACRS letters of advice, as determined by the dates that are entered on these documents.

This tabulation obviously indicates that the Committee is acting promptly. In view of the fact that the ACRS waives its 15-day "rule" frequently, it is abundantly clear that the ACRS is making a genuine effort to expedite the safety review process, even to the point of breaking its own administrative rules when the urgency of cases makes this necessary.

There are various additional comments about this tabulation that could be made; as, for instance, the fact that three of these cases for which the elapsed time in fact exceeded 20 days actually represent a joint attempt by the Committee and the AEC Regulatory Staff further to streamline their safety review. These particular cases were a special group for which the staff made its analyses available quite early in order that the Committee could consider whether a formal, full-scale presentation at its next meeting could be omitted. In fact, this was found to be possible, and a considerable effort on the part of all concerned was thus avoided and the safety review of these cases considerably expedited. On occasion an ACRS review indicates that an applicant must examine or re-examine specific areas, such as design, operating procedures, or organization. In several instances of this kind an ACRS letter has not been written until the applicant has reappeared to clarify the points in question. We believe that this additional attention to design details has resulted in significant improvements in reactor safety.

I hope that you find these details of ACRS activities of interest, and thank you sincerely for the opportunity to communicate them to the Joint Committee.

Sincerely yours,

/s/

F. A. Gifford, Jr.
Chairman