

**From:** Farouk Eltawila *RES*  
**To:** Boyd, Christopher, Schaperow, Jason, Tinkler, Ch...  
**Date:** Tue, Apr 11, 2000 2:17 PM  
**Subject:** Fwd: ACRS Recommendations

FYI. Let us discuss, implication on our work.

*G/12*

**From:** Gilbert Millman *EDC*  
**To:** Ashok Thadani, Samuel Collins, William Kane  
**Date:** Tue, Apr 11, 2000 12:04 PM  
**Subject:** ACRS Recommendations

It is expected that the following thoughts will be contained in ACRS recommendations to be issued shortly. The recommendations are the result of ACRS meetings held during the week of April 3, 2000.

Draft Final Technical Study of Spent Fuel Accident Risk at Decommissioning Nuclear Power Plants

The integrated rulemaking on decommissioning should be put on hold until the staff provides technical justification for their proposed acceptance criterion for fuel uncover frequency.

Issues of concern are: (1) the need to incorporate the effects of enhanced release of ruthenium under air-oxidation conditions, (2) the impact of the MACCS code assumptions on plume related parameters in view of the results of a recent expert elicitation, (3) the need to strengthen the technical basis underlying the zirconium-air interactions and the criteria for ignition, (4) the potential impact of zirconium-hydrides in high burnup fuel, (6) the susceptibility of the clad to break-away oxidation, and (7) the need to quantify uncertainties in the risk-assessment and make them a part of the decision-making process.

Reactor Safety Goal Policy Statement

An entirely new policy statement on risk-informed regulation should be developed that would include: (1) the concept of risk limits for individual plant applications, (2) consideration of a "three region approach" that defines CDF and LERF boundaries that would be consistent with "adequate protection" and that would define "how safe is safe enough," and (3) guidance on "defense-in-depth" to address uncertainties in the risk assessment.

**CC:** Carl Paperiello, Charles (Ernie) Rossi, Frank Mi...