

[j.] Finally, there is serious question as to whether the true societal risk can be evaluated by the Probabilistic Risk Assessment (PRA) methodology due to such factors as the unknown uncertainties in PRA results, for which there is no generally accepted method of analysis.*+

[k.] These issues should be considered.

*M.E. Trere and R.G. Menzel "Runoff of Strontium-90 from Agricultural Land Surfaces," in "Radioactive Fallout from Nuclear Weapons Tests" (USAEC Div. of Tech. Info. TID-6-118, Feb. 1962).

°"Response to GAO questions on NRC's use of PRA", S.C. Sholly, October 6, 1983 letter to J.E. Bagnulo, U.S. General Accounting Office, Washington, DC 20548.

+ "Response to Specific Questions on the Indian Point Probabilistic Safety Study", Report by the U.S. General Accounting Office, GAO (RCED-83-158) (May 24, 1983).

Response

SAS/VW in this contention generally allege that Applicants have not adequately addressed the site specific acute and latent health effects and overall economic losses resulting from a major accident of Marble Hill. In paragraph b, SAS/SV point out that the NRC Staff has questioned the sufficiency of the information in ER-OL 7.1.2. In their October 28, 1983 response to the Staff, Applicants indicated that the results of a revised severe accident analysis would be available in the first quarter of 1984 and would contain the information requested by the Staff in its September 28, 1983 letter.

Also in their October 28, 1983 response, Applicants responded to ER-OL question 450.2 and indicated that population data for the region between 50 and 500 miles from Marble Hill were not readily available and that the average population distribution used for the Marble Hill analysis was specified in the CRAC2 User's Guide as the average population density of the