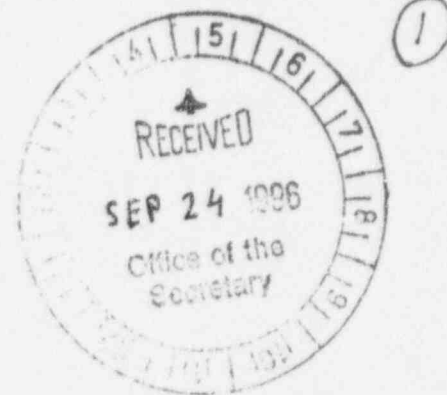


From: webadmin <webadmin@nrc.gov>  
To: WND1.WNP2(secy),NCD1A.ncp2(webadmin)  
Date: 9/24/96 6:33pm  
Subject: Strategic Assessment (Forms submission)



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Boston, Massachusetts 02110  
Number of the Issue Paper: 12  
Topic: 1 (omissions)  
Stephen Maloney sent the following comment via the WWW server:

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The most significant oversight is the issue of measurement.

Central to that issue is the contrast between the nuclear industry's fixation on PRA estimates and the practical methods of statistical performance monitoring.

As the recently reviewed fire risk studies demonstrate, there is substantial volatility in PRA methods and data structures. Even if these problems are resolved, at best, a PRA-focus merely offers a highly speculative estimate, to a diminishingly small frequency. Key to this impactful CDF estimate is the assumption that a plant completely conforms with design and license standards.

In cases where plants deviate from such those standards (e.g., Northeast Utilities) or in a configuration or operating scenario not considered, all bets are off.

And, since it has yet to be shown that Northeast Utilities' design control experience is significantly different from the US reactor population, the relevance of PRA for policy decisions seems even further from the practical decisions of NRC inspectors and plant managers.

This point cannot be overlooked. If PRA was shown to be reliable, there would be a demand by plant managers and inspectors to use it. We suspect many advocates for PRA are those who want to do PRA, and are looking for NRC to create a market for their services.

The agency should give up the ghost on PRA. Thirty years, when there was no data, perhaps a case could be made for inferential methods and probabilistic techniques. Despite endless pilot studies and millions of dollars spent, the "black art" of PRA

continues to fall short on the most fundamental issues of any mathematical model: validation, reproducibility, precision and continuity, and measuring the experience of change.

Thirty years of operating experience with real reactors is probably more informative than any engineer's risk frequency speculation.

The agency and industry might benefit from how competitive industries deal with comparable issues of performance and reliability management. Long ago, statistical quality and process control methods were proven to be readily implemented in a production environment, successful in inferring contributions to poor performance, and simply to validate ensure quality.

ISO 9000 certification has injected quality and performance measurement into aging and new technologies alike.

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Server protocol: HTTP/1.0

Remote host: www-f8.proxy.aol.com

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