

June 7, 1996

MEMORANDUM TO: ACRS Members
John Larkins, Executive Director, ACRS
Roxanne Summers

FROM: J.C. Carroll *J.C. Carroll*

SUBJECT: Health Effects of Low-Level Radiation

I said during the May meeting that I would provide a critique of Dana Powers' memos to Roxanne Summers dated May 5 and May 18, 1996. I had only read Dana's May 5, 1996 memo at the time. Dana in his May 18, 1996 memo now accepts the idea, at least in principle, that a "piecemeal approach" (external exposure as opposed to all forms of radiation exposure) may be appropriate. No disagreement there, although I would state it more positively. I believe that the Commission should do what it can to encourage resolution of this issue, recognizing that in the final analysis, the NCRP (and probably ICRP) positions must change before the NRC can change its regulations with respect to low-level radiation. I'm sure this is true from a political point of view, but I also think it is a legal requirement that Federal agencies base their regulations on the recommendations of NCRP. You should probably obtain an OGC opinion on this point. (It would be helpful if Roxanne could research these issues and report her findings to the Committee during the June meeting.)

The Committees also need to explore in detail with NCRP the approach NCRP is taking in its current NRC-sponsored (financially) study and provide comments to NCRP, as appropriate. I'm told that time was not available during the Joint subcommittee meeting to do this. It could be that the NCRP study is perfectly fine and will provide the needed scientifically objective analysis of all available data in a timely manner. If this proves to be the case, a much shorter and less controversial letter could be prepared recommending that the Commission take the needed steps to assure that the staff continues to support and participate in the NCRP and international activities dealing with this subject. Additionally, Dana's main objections to the present draft, most of which I agree with, would go away.

The present draft letter implies that the NCRP study group is hopelessly biased in favor of the LNT. I don't think we have a basis for this conclusion. I've personally known several past and present members of NCRP and don't believe that this is an appropriate criticism, at least to the individuals I know.



OFFICE OF THE
SECRETARY

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

June 11, 1996

IN RESPONSE, PLEASE
REFER TO: M960524

MEMORANDUM TO: John T. Larkins, Executive Director
Advisory Committee on Reactor Safeguards

FROM: John C. Hoyle, Secretary

SUBJECT: STAFF REQUIREMENTS - MEETING WITH ADVISORY
COMMITTEE ON REACTOR SAFEGUARDS (ACRS),
FRIDAY, MAY 24, 1996, COMMISSIONERS'
CONFERENCE ROOM, ONE WHITE FLINT NORTH,
ROCKVILLE, MARYLAND (OPEN TO PUBLIC
ATTENDANCE)

The Commission was briefed by the ACRS on the following topics:

1. Use of IPEs in the regulatory process, PRA framework document, pilot applications, and the next steps to expand the use of PRA in the regulatory decision-making process
2. Fire protection issues, including fire PRA models and PRA-based scoping analysis of degraded fire barriers
3. Proposed final revisions to 10 CFR Parts 50 and 100
4. Status of ACRS review of Regulatory Guidance documents related to digital instrumentation and control systems
5. Status of ACRS review of standard plant designs:
 - ABWR and System 80+ design certification rules
 - AP600 design
 - Test and analysis programs associated with the AP600 and SBWR designs
6. Conformance of operating plants with NRC safety goals

The Commission requested ACRS input on GE's recent submittal containing safety significant design changes prior to the Commission briefing on the design certification rulemakings scheduled for late August.

(ACRS)

(SECY Suspense: 8/22/96)

The ACRS should continue their review efforts, as noted in the meeting, in the digital instrumentation and controls area.

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The ACRS should continue to interact with the staff in the development of regulatory guidance and a standard review plan for the performance and review of PRAs. In particular, the ACRS should advise the staff regarding appropriate methods for judging the acceptability and unacceptability of assumptions and models to be used when performing PRAs.

The ACRS should provide recommendations on how the Commission's safety goals and safety goal policy should be revised to make them acceptable for use on a plant-specific basis.

cc: Chairman Jackson
Commissioner Rogers
Commissioner Dicus
EDO
OGC
OCA
OIG
Office Directors, Regions, ACRS, ACNW, ASLBP (via E-Mail)
PDR - Advance
DCS - P1-24