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October 16, 1985

Mr. Karl Kniel
Division of Safety Technology
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

SUBJECT: AIF Comments on Issuance and Availability Draft NUREG 1032 "Evaluation of Station Blackout Accidents at Nuclear Power Plants" 50 FR 34332

Dear Mr. Kniel:

The Atomic Industrial Forum Committee on Reactor Licensing and Safety, through its Working Group on Station Blackout, has reviewed the subject NUREG. It is not the intent of this letter to comment on the detailed technical matters contained in NUREG 1032. It is expected that other industry organizations will submit such detailed comments. Rather it is our intention to address a policy concern. The NUREG is intended to provide the technical basis for new NRC requirements to resolve USI A-44 --- Station Blackout. In our judgment, for the reasons discussed below, the NUREG does not provide an adequate basis for new requirements.

The NRC recently promulgated a final rule concerning backfitting. That rule states, in part:

"The Commission shall require the backfitting of a facility only when it determines ... that there is a substantial increase in the overall protection of the public health and safety or the common defense and security to be derived from the backfit and that the direct and indirect costs of implementation for that facility are justified in view of this increased protection."

New requirements resulting from any NRC action, including resolution of Unresolved Safety Issues, must thus be founded on a basis of increased protection of public health and safety. Although NUREG 1032 was drafted before final promulgation of the new rule, new Station Blackout requirements must be considered in conformance with its requirements.

The NUREG focuses instead on core damage frequency as the overriding consideration in addressing Station Blackout accident scenarios. Further it adopts a core damage frequency from Station on the order of 10^{-5} per reactor year as a criteria to be met and maintained for all plants. Core damage frequency is, of course, of vital interest to a reactor plant owner because of the potential economic consequences. These economic interests, however, are not an appropriate basis for NRC regulatory action which must be founded, as the new backfit rule confirms, on health and safety considerations.

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In this regard, analyses performed for the NRC Staff have shown that the public health and safety risk from station blackout accident scenarios is very small. For example, NUREG 0956 (The NRC Staff source term reassessment report) states, "For certain chemical element groups and most sequences, for instance, iodine and cesium for both the large LOCA and station blackout sequences for Surry, the BMI-2104 results are lower (than RSS) by about an order of magnitude" (emphasis added). Since public risks are a non-linear function of source term, utilization of revised source term data would likely reduce the risk estimates for such sequences by greater than an order of magnitude.

In addition, the IDCOR study has confirmed that the public health and safety risk from station blackout accident scenarios is very low.

In summary, it appears that NUREG 1032 "Evaluation of Station Blackout Accident Scenarios at Nuclear Power Plants" has been developed without consideration of other important ongoing NRC and industry activities, such as;

- the Commission's policy in the recently promulgated backfit rule,
- the NRC Staff source term reassessment report, and
- the comprehensive industry/IDCOR studies which have specifically reexamined the public health and safety risk from Station Blackout accident scenarios.

Absent such consideration, the analyses described in NUREG 1032 cannot be relied on as an adequate technical basis for regulatory action.

We would be pleased to discuss these comments with you.

Sincerely,

Murray R. Edelman
Chairman, Committee on
Reactor Licensing and Safety

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