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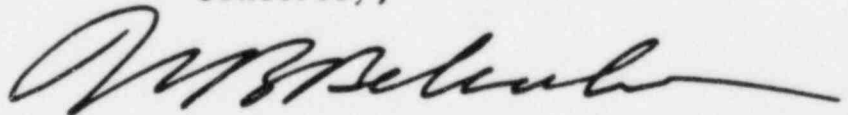
The Honorable Nunzio J. Palladino
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Palladino:

Over the past year, we have urged the Commission to go slow on imposing additional backfitting requirements until the source terms used to assess the risk to public health and safety have been reevaluated in light of the data emerging from research initiated following the accident at Three Mile Island. Our concern is to avoid the wasteful expenditure of funds and manpower resources on backfitting which would not be required, or even desirable with the revisions to source terms likely to result from the Commission's reevaluation.

We are concerned that the NRC staff appears to be proceeding with development of new requirements related to station black-out. Our analysis suggests that this is an area where the public risk is currently less than one percent of the design objectives proposed in the Commission's "Policy Statement on Safety Goals for the Operation of Nuclear Power Plants" and any downward revision in source term assumptions would further lower the risk. We, therefore, urge the Commission to insist that any staff proposals for new backfitting requirements related to station blackout be tested in accordance with the methodology set forth in the Policy Statement using the most current source term information.

Sincerely,



Wallace B. Behnke
Chairman, AIF Policy Committee
on Nuclear Regulation

WBB:seu

cc: Commissioner Asselstine
Commissioner Bernthal
Commissioner Roberts
Commissioner Zech

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