

DSI-12

(15)

From: Glenn Kelly  
To: WND1.WNP2.SECY  
Date: 11/13/96 3:37pm  
Subject: comment on Issue No. 12



9611200143 961113  
PDR NRCSA I PDR  
12

DS13

Comment on Issue No. 12  
Risk-Informed, Performance-Based Regulation

The NRC's resources are being diminished by the Congress and at the same time the responsibilities and expectations of the Congress and the public for the NRC are increasing. It is not clear how much more new/redefined work NRC can absorb as currently staffed/funded and still meet its regulatory and safety commitments. To help mitigate this problem, one can read Issue No. 12 as proposing to set the priority of work in NRC using risk-informed, performance-based regulations. NRC resources would only be applied to those problems that brought the most "bang for the buck" in improved safety. The unintended consequence of this might be to destroy the nuclear industry. There clearly are changes that are economically important to utilities that could be made to a plant or its procedures that do not directly effect safety to any great extent by either increasing or decreasing calculated safety. Yet, these same modifications could decrease costs to the utility by tens-of-thousands to millions of dollars per year.

I have been a PRA practitioner for 13 years and have been involved in the nuclear industry and NRC for over 22 years. I believe that what ever formula you devise to determine the priority of work in NRC must somehow accommodate the need to allow/encourage licensees to improve the economics of their plants while still maintaining an adequate level of safety for the public and workers at the plant. A utility that has a plant that is just scraping by or is losing money is not going to be viable in the long term. If we ignore the economics, we take the risk of causing long-term reduction in safety at plants and worsening their plant performance.