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Safety Goal
(45 FR 71023)
NUCLEAR POWER

SYSTEMS DIVISION
MFN-204-80

NRC PUBLIC DOCUMENT ROOM

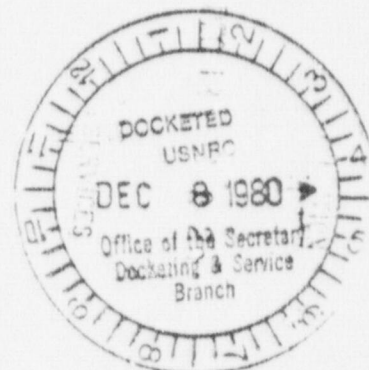
November 26, 1980

Nuclear Regulatory Commission
Office of Policy Evaluation
Washington, D.C. 20555

Attention: E. J. Hanrahan, Director

SUBJECT: POLICY PAPER ON SAFETY GOALS

Reference: Plan for Developing a Safety Goal (NUREG-0735) Nuclear
Regulatory Commission, October 27, 1980



This letter provides General Electric's comments on the NRC staff plan for developing a safety goal. General Electric strongly endorses the NRC's decision that a safety goal should be developed to establish objectives for the design and operation of nuclear reactors.

General Electric believes that the formulation of a safety goal is an essential ingredient to the successful conduct of the degraded core rulemaking. Without an agreed upon safety goal there would be no logical basis on which to establish the conclusions from the rulemaking process. We recommend that high priority be given to development of an interim safety goal. We believe that an interim goal could be adopted from current work by the ACRS, NRC and industry which generally agree on the character and magnitude of the goal. This could be completed through Federal Notice by mid-1981.

We offer the following comments on the NRC plan.

- 1) The goal should focus on providing an adequate level of protection to the public relative to the benefit derived from the plant-electrical power production. This level of protection should be presented in the form of a quantitative risk statement. The format of the risk statement should permit either the specification of a radiation dose or projected health impact as a function of event probability.

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This external consequence versus probability statement should not be supplemented with conditional probability criteria. Specifically, an acceptance limit on the probability of maintaining containment integrity assuming a core melt is not desirable. Conditional probability statements arbitrarily impose prescriptive criteria which mandate either mitigative or preventive requirements. A safety goal which properly focuses on a risk statement for the public will accommodate either preventive or mitigative actions, whichever is the most appropriate for the specific conditions.

- 2) The risks associated with other means of electrical power production (e.g. coal, liquified natural gas, oil) and other technological activities should be used as a guide for establishing the quantitative risk statement desired for a safety goal for nuclear power plants.
- 3) If risk assessments on individual plants demonstrate that the risk is less than the safety goal, plant improvements should not be required. Any ALARA activities should be considered under separate programs. If risk assessments indicate that the evaluated risk exceeds the safety goal, plant modifications should be made.

In summary, General Electric believes that the establishment of a safety goal is of paramount importance. Although current design bases are sufficient for continuation of the licensing process, General Electric considers a safety goal necessary for use as an acceptance criteria in rulemaking activities related to the light water reactor design basis. An interim safety goal could be developed by mid-1981 by establishing a consensus from the various goals currently being proposed. This goal would be the basis for rulemaking actions until the final goal is established.

If you have any questions concerning these comments, please contact me at 408-925-5040 or R. H. Buchholz of my staff at 408-925-5722.

Very truly yours,

RHBuchholz for

G. G. Sherwood, Manager
Safety and Licensing Operation

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