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W. Scott

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January 10, 2000

Rules and Directives Branch
Office of Administration
U.S.N.R.C.
Washington, D.C. 20555-0001

Gentlemen,

The Illinois Department of Nuclear Safety appreciates the opportunity to comment on DG-1082, Assessing and Managing Risk Before Maintenance Activities at Nuclear Power Plants. Managing risk is an important element of our preventive safety programs to protect the health and safety of the public. My staff reviewed the referenced document.

Concurrent with the review, I received information regarding the risk-measuring concepts of "change in core damage frequency" versus "change in core damage probability". The information was provided in conjunction with my participation on the new assessment program Pilot Program Evaluation Panel. The concepts will be debated at our next meeting.

Given that DG-1082 contains risk determination elements affected by the outcome of this debate, we request a two month extension of the comment period. An extension will allow IDNS time to better understand the underlying differences between conditional core damage probability versus core damage frequency in managing risk.

Should you have any questions, please contact me at (217) 785-9851.

Sincerely,

Gary N. Wright, Manager
Office of Nuclear Facility Safety

GNW:NTH:rkw

bcc: Neill Howey

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