May 17, 1991

MEMORANDUM FOR: James M. Taylor
Executive Director for Operations

FROM: Samuel J. Chilk, Secretary /S/

SUBJECT: SECY-91-102 - INDIVIDUAL PLANT EXAMINATIONS OF EXTERNAL EVENTS (IPEEE) FOR SEVERE ACCIDENT VULNERABILITIES

This is to advise you that the Commission has not objected to the staff's intention to issue the revised Supplement 4 to Generic Letter 88-20 and the revised NUREG-1407. A significant number of editorial mistakes have been noted in the generic letter and the NUREG which should be corrected prior to publication. The attached comments should also be incorporated into the final version prior to publication.

Attachment:
As stated

cc: Chairman Carr
Commissioner Rogers
Commissioner Curtiss
Commissioner Remick
OGC

SECY NOTE: THIS SRM AND SECY-91-102 WILL BE MADE PUBLICLY AVAILABLE 10 WORKING DAYS FROM THE DATE OF THIS SRM

Comments on Supplement 4 to GL 88-20 and NUREG-1407

(1) In the Generic Letter, revise item 12 on page 24 which concerns the fire evaluation to be consistent with item 7 on page 21 which concerns the seismic evaluation.

(2) The item on page 22 of the NUREG concerning evaluation of outliers for the reduced scope program should be revised to indicate that discovery of such an outlier should be handled under 10 CFR 50.72(b).

(3) On page 22, the evaluation of outliers for the focused scope program seems to require three steps that are redundant: (1) evaluation of capacities, (2) ranking, and (3) evaluation of capacities. Review these steps as written and clarify the intent.

(4) On page 42, the section on peer review gives guidance on the makeup of the "seismic review team". However, that group was previously defined as the group doing the evaluation. Either move the guidance to the section on the seismic evaluation or clarify that the seismic peer review team was meant.

(5) Some comments were received from several different organizations and they are repeated several times in Appendix D. The answers are sometimes slightly different; this will only lead to confusion among the readers. Therefore, Appendix D should be revised to conform to the standard agency practice of combining all comments on a given subject and answering them all at once. If this is.not possible, the answers should be carefully reviewed to assure that they contain <u>exactly</u> the same information. Three issues that I am specifically concerned about are: the use of the LLNL and EPRI hazard curves, the binning process, and relay chatter evaluations.

(6) On page 71, the answer to question 7.2 seems to allow the option of using a licensee-developed hazard curve, while at the same time requiring the use of both LLNL and EPRI hazard curves. lt is Commission policy that licensees are always allowed to propose alternative methods, subject to review and approval by the staff. This should be clarified in the text of Appendix D, and the main text reviewed for consistency.

(7) On page 72, the answer to question 1.1 neglects to point out that changes to the design basis of the plant, in addition to being "documented, tracked, and accounted for in the future", must be made in accordance with the provisions of 10 CFR 50.59 if they are changes to the design basis in the FSAR or must have

prior staff review and approval if they involve unreviewed safety questions or changes to the Technical Specifications.

(8) On page 74, remove the final sentence in the staff response to question 1.10.

(9) On page 80, the statement of question 6.2 and the staff response are unintelligible to someone without the reference in hand. Add enough information to the answer to clarify it for the reader.

(10) On page 82, remove the reference to the Armenia earthquake. It is my understanding that the Soviets would not agree with the existing statement.

(11) On page 90, the second paragraph of the answer to question 7.17.6 should be removed because it does not add any information relative to the question as stated.

(12) On page 91, the staff response to question 7.17.10 should be reviewed. There is no problem with the recommendation that the report for the reduced scope review should be concise. However, the staff should not indicate that it has "no disagreement" with the guidance outlined in EPRI NP-6041 unless it has determined that there is no conflict with the reporting requirements in GL 88-20 Supplement 4 or Appendix C of NUREG-1407. If the staff does not know whether or not a conflict exists, a simple reiteration of the location of our reporting requirements should suffice.

(13) On page 97, the second paragraph of the answer to question 7.42 does not seem to be germane to the question as stated. Modify the question to indicate how the paragraph applies or remove the paragraph, whichever is appropriate.

(14) On page 97, the answer to question 7.44 seems to be at variance with the guidance given for the IPE as far as PRA is concerned. Review the answer and modify, if appropriate.

(15) In the attachment to Appendix D, the conclusions are not supported by the text. Either change the conclusions or provide justification in the preceding text for the conclusions as they stand.