

UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

July 17, 1990

MEMORANDUM FOR: James M. Taylor  
Executive Director for Operations

William C. Parler, General Counsel

FROM: Samuel J. Chilk, Secretary

SUBJECT: SECY-90-192 - INDIVIDUAL PLANT EXAMINATION  
FOR SEVERE ACCIDENT VULNERABILITIES DUE TO  
EXTERNAL EVENTS (IPEEE)

This is to advise you that the Commission, as noted below, has agreed to the following in regard to the proposed issuance of the supplement to Generic Letter 88-20:

- 1.) The Commission approved issuing the supplement to the Generic Letter in draft form along with the guidance document prior to the staff's proposed workshop. Following the workshop the staff should submit a negative consent paper which summarizes discussions at the workshop, addresses any concerns, identifies any proposed modifications to the letter and guidance document, and addresses any further ACRS comments.

(EDO) (SECY Suspense: 11/90)

- 2) The Commission, with Commissioners Rogers, Curtiss, and Remick approving, agreed that prior to returning the final Generic Letter to the Commission, the General Counsel should undertake an analysis of the backfit issue raised by the Nuclear Utility Backfitting and Reform Group (NUBARG). The General Counsel should focus in particular on NUBARG's argument that where it is unclear at the outset whether a backfit will follow an information request, such cases should be resolved in favor of conducting a backfit analysis under section 50.109 (See letter from Nicholas S. Reynolds to Edward L. Jordan, April 13, 1990, p. 6). If, as the language accompanying the 1985 amendments to section

50.54(f) seems to suggest, a backfit analysis is called for

NOTE: THIS SRM, THE SUBJECT SECY PAPER, AND THE VOTE SHEETS COMMISSIONERS REMICK, ROGERS, AND CURTISS WILL BE MADE PUBLICLY AVAILABLE IN 10 WORKING DAYS FROM THE DATE OF THIS SRM.

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in a case such as this, the Commission should either undertake such an analysis or, if such an analysis makes no sense for information requests of this nature, the Commission should revisit the existing regulation (or the accompanying Statements of Consideration) and modify the approach that was endorsed in 1985. Chairman Carr believes this issue was looked at in the context of approving the IPE program.

(OGC) (SECY Suspense: 10/90)

The Commission notes that the supplement to the Generic Letter identifies the minimum information that licensees should document and submit to the NRC in each of the five areas. The information requested, while not unreasonable, is sufficiently voluminous when added to that from the IPE process to challenge the NRC data bank planned for abstracting and comparing "similar" plant IPE and IPEEE results. The Commission wants to stress the importance of continuing the planning and structuring of the data bank and its associated computerization. The Commission also urges the staff to refine their estimates of the resources needed to conduct the IPEEE reviews, based upon early IPE submittals in FY 1991 and independent licensee estimates of the content involved.

The Five Year Plan states that by mid 1995 completion of all or most of the 1) IPE and IPEEE reviews, 2) severe accident research, and 3) significant accident management research should enable closure of the Severe Accident Program. Only 16 FTE per year (FY 91-95) in RES and 26 FTE per year (FY 91-95) in NRR are budgeted for the program elements containing IPE and IPEEE reviews. It is therefore important to attempt to refine the estimated actual FTE requirements in the outyears, or alternatively, to establish an upper FTE limit which is to be allocated to the Severe Accident Program to bring it to an orderly close by the end of FY 1995.

cc: Chairman Carr  
Commissioner Rogers  
Commissioner Curtiss  
Commissioner Remick  
ACRS  
IG  
GPA