

September 2, 2004

Mr. Brian Brogan
NMC - Palisades
27780 Blue Star Highway
Covert, MI 49043

SUBJECT: TRANSMITTAL OF REVISION 1 SIGNIFICANCE DETERMINATION PROCESS
RISK-INFORMED INSPECTION NOTEBOOK AND INFORMATION REQUEST
FOR NEXT REVISION

Dear Mr. Brogan:

On September 30, 2003, the NRC completed a two-year benchmarking activity for 71 Significance Determination Process (SDP) risk-informed inspection notebooks. All 71 notebooks were issued as revision 1, incorporating information obtained during the initial benchmarking visits. The NRC appreciates the support of each licensee in this resource intensive, first-of-a-kind effort which has greatly improved the quality of each SDP notebook to reflect the plant design-features, operational procedures and, in many cases, reduced unnecessary conservatism.

Over the course of this two year effort, insights were gained and it became apparent that these lessons learned would need to be captured in all of the notebooks, with additional effort needed for updating the notebooks that were benchmarked early in the process. It was also recognized that periodic maintenance would be required to achieve a reasonable level of accuracy as a screening tool, given changes in plant design, procedures, and revisions to the plant-specific probabilistic risk assessment (PRA) models since the original benchmarking visit.

In April of 2004, the NRC and its contractor Brookhaven National Laboratory (BNL) embarked on an SDP notebook enhancement/standardization effort for all 71 notebooks through a revision 2 process. Each revision 2 SDP notebook will contain a target set of equipment that is pre-solved in a manner similar to what was performed as part of the revision 1 benchmarking effort, in addition to capturing the lessons learned, and requesting information specific to gaps in the individual notebooks. The NRC estimates completion of the revision 2 SDP notebooks by June 30, 2005.

In order to achieve this milestone with minimal burden, the NRC requests that the plant-specific information for Palisades specified on the enclosed CD be sent to the address provided below. The CD also contains the revision 1 SDP notebooks generated from the initial benchmarking visit. The NRC requests that your response to the plant-specific information be provided on a CD within 30 days of receipt of this request. In addition to the plant-specific requests, the NRC welcomes your comments on the revision 1 SDP notebooks.

Mailing address for response:

Michael Tschiltz, Chief
Probabilistic Safety Assessment Branch
MS: O10-H4
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852-2738

The NRC staff is continuing to review the appropriate classification of the enclosed CD documents within the records management program considering changes in our practices following the events of September 11, 2001. Pending a final determination, the information request and the notebooks have been marked as "Proprietary Information" in accordance with Section 2.390(d) of Title 10 of the Code of Federal Regulations (10 CFR 2.390). Please control the document accordingly (i.e., treat the document as trade secrets and commercial or financial information that you considered privileged or confidential). We will inform you if the designation of the documents change as a result of our ongoing assessments.

If you have any questions regarding the request, please contact Robert Perch at 301-415-1422.

Sincerely,

/RA/

Michael Tschiltz, Chief
Probabilistic Safety Assessment Branch
Division of Systems Safety and Analysis
Office of Nuclear Reactor Regulation
Nuclear Regulatory Commission

Enclosure: As stated

B. Brogan

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