NUCLEAR ENERGY INSTITUTE

April 5, 1994

Dr. Ashok Thadani, Associate Director
Inspection and Technical Assessment
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, DC 20555-0001

Dear Dr.Thadani:

Enclosed for the NRC staff's consideration is a white paper that discusses the implications of draft NUREG-1488, "Revised Livermore Seismic Hazard Estimates for 69 Nuclear Power Plant Sites East of the Rocky Mountains," on the seismic portion of the Individual Plant Examination of External Events (IPEEE). As we noted in our March 3, 1994, letter to you, we believe these revised hazard estimates in conjunction with other seismic risk assessment insights, indicate that most "focused scope" plants should instead perform "reduced scope" studies as part of the seismic IPEEE.

We are providing our members with a copy of this white paper and are suggesting that they review this material in order to determine whether a change in IPEEE category, and consequently the scope of their efforts, are justified for any of their plants. The individual licensees should approach this topic as cost-beneficial licensing activities. Although many seismic evaluations are now well along, changing to a reduced scope would nevertheless result in substantial savings (as much as $250,000 per plant) by avoiding unnecessary analyses.

We believe a revision to the Generic Letter 88-20, Supplement 4, would be neither timely nor necessary. Rather, each licensee is responsible for proposing the most cost-effective program to satisfy the seismic IPEEE request consistent with the level of seismic hazard at the specific site. This includes revising any IPEEE commitment, if necessary.

We note utilities are committed to performing the detailed plant walkdowns regardless of binning classification. These walkdowns are the most cost-effective aspects of the IPEEE programs and are carried out by qualified and trained personnel. The

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experience of the past 15 years has shown that all the weak elements which were subsequently modified or repaired were identified at the time of the walkdowns.

In order to facilitate a clear understanding of the rationale and technical bases contained in the white paper, we would welcome the opportunity to meet with the NRC staff at the earliest convenience. If your staff have questions on this information they should be directed to either Dave Modeen or Mehdi Sarram of the NEI staff.

Sincerely,

William H. Rasin
Vice President & Director,
Technical

WHR/DJM/rs
Enclosure

c: J. Murphy, NRC
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G. Bagchi, NRC