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ACCESSION NBR: 8803010130 DOC. DATE: 88/02/22 NOTARIZED: NO DOCKET #
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AUTH. NAME AUTHOR AFFILIATION
BRONS, J. C. New York Power Authority (formerly Power Authority of the S
RECIP. NAME RECIPIENT AFFILIATION
Document Control Branch (Document Control Desk)

SUBJECT: Provides response to Generic Ltr 88-02, re ISAP II. Generic ltr does not provide sufficient info for authority of make final decision re participation in ISAP II. Recommends meeting w/NRC to discuss issue.

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New York Power Authority

John C. Brons
Executive Vice President
Nuclear Generation

February 22, 1988
JPN-88-005

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Integrated Safety Assessment Program II (ISAP II)

Reference: 1. Generic Letter 88-02, F. J. Maraglia to All Power Reactor Licensees, dated January 20, 1988, concerning utility participation in ISAP II.

Dear Sir:

Generic Letter 88-02 (Reference 1) described ISAP II briefly and requested that the Authority respond to a series of questions intended to gauge our interest in participation in the program. A detailed response to those questions is provided in Attachment 1 to this letter.

The generic letter does not provide sufficient information for the Authority to make a final decision regarding participation in ISAP II. There are several aspects of the program that offer obvious benefits to any participant. These include developing an integrated schedule, combining related issues which are in separate regulatory review areas, evaluating generic issues on a plant specific basis, allowing the probabalistic risk assessment (PRA) to partially satisfy the requirements for a Individual Plant Evaluation (IPE), using a combination of probabalistic and deterministic methods to evaluate issues and gaining potential plant life extension benefits.

The Authority is concerned that these potential benefits may be offset by other factors which are not fully discussed in the generic letter. Principal among these is the manner in which the integrated schedule would be negotiated with the NRC and implemented. The program describes a process in which issues are resolved and ranked by categories. The categories then determine the number of outages before the resolution is required. Following NRC approval of the resolution of the issues and its ranking, the utility and the NRC negotiate an integrated schedule which details milestones and completion

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It is not clear how the regulatory issue resolution approved by the NRC would subsequently be incorporated into the integrated schedule developed by the utility. The Authority also does not understand the need to "instill a certain amount of rigor (in)to the process" by means of a license amendment, when participation in ISAP II is voluntary. The license amendment clearly implies that participants in the program cannot be relied upon to act in good faith to meet their commitments.

In order to clarify and resolve these and other questions, I recommend a meeting between the NRC staff and other interested utilities to discuss ISAP II. This meeting could then be followed by individual meetings with utilities on an as requested basis. The Authority would attend a meeting between the NRC staff and other interested utilities. Following such a meeting, we would be in a much better position to determine our interest in participating in ISAP II.

Should you or your staff have any questions regarding this matter, please contact Mr. J. A. Gray, Jr. of my staff.

Very truly yours,

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cc: Office of the Resident Inspector
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Mr. Harvey Abelson
Project Directorate I-1
Division of Reactor Projects - I/II
U.S. Nuclear Regulatory Commission
11555 Rockville Pike
Rockville, MD 20852

Attachment 1 to JPN-88-005

Response to Generic Letter 88-02

Facility Name: James A. FitzPatrick Nuclear Power Plant
Indian Point 3 Nuclear Power Plant

Utility: New York Power Authority

Individual Contact Name: J. A. Gray, Jr. Phone Number: 914-681-6289

1. Question: Would you be interested in participating in ISAP II? If so, in what time frame.

   Response: The Power Authority does not have enough information to make a decision regarding participation in ISAP II. However, the program offers promise in several areas and we are interested in further discussions with the NRC. We require more detailed information on the program and resolution of some problem areas before committing the resources necessary for participation. Since we are currently expending significant resources on integrated schedules and PRA at this time, we would like to reach a decision on participation in ISAP II by June 1.

2. Question: Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial prior to making a decision?

   Response: An NRC/industry meeting on ISAP II is essential for utilities to obtain enough information to seriously evaluate whether or not to participate. The description provided in the generic letter provides a basis for the meeting but is not detailed enough to make a decision on participation.

3. Question: Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility or facilities?

   Response: The Authority is interested in learning more about the program. However, individual meetings would not be useful until a general meeting was held with all interested utilities.

4. Question: If you remain undecided regarding participation, what additional information do you need in order to make a decision?

   Response: The Authority requires clarification of the mechanism for negotiating an integrated schedule with the NRC. We would also like to know that the Level 1 PRA would be an adequate short term response to the requirement for an Independent Plant Evaluation and that the containment vulnerability study would be incorporated into the integrated schedule.

5. Question: Do you have any potential concerns about participating in ISAP II?

Response: The Authority has several concerns about the program as described in Generic Letter 88-02. The two most significant are the development of the integrated schedule and the staff's position on a license amendment. The generic letter indicated that the resolutions of the issues would be ranked in categories that would determine the number of outages until its implementation. This would take place prior to development of the integrated schedule. The Authority's view is that this effectively defeats the purpose of an integrated schedule.

The second concern is the staff's requirement for a license amendment in order "to instill a certain amount of rigor (in)to the process". The generic letter describes participation in ISAP II as voluntary. If this is the case, it is hard to understand the need for a license amendment. It is even more difficult to understand the need to put actual completion dates into the license. A utility participating in ISAP II would be assuming a position of leading the nuclear industry in evaluating its plant and resolving safety issues. The requirement for a license amendment implies that these participating utilities cannot be trusted to exert their best efforts to meet significant commitments to the NRC. The Power Authority considers these two viewpoints totally incompatible and that the requirement for a license amendment should be dropped.

6. Question: Do you have any suggestions for program improvements or changes?

Response: The Authority's suggestions for improvement of ISAP II are described in the responses to the previous questions. In summary, the program could be substantially improved and participation made more attractive by doing the following: deleting the requirement for a license amendment; ranking the resolutions of the issues without determining the outage in which they should be implemented (this should be done in the integrated scheduling process); and, incorporating the containment vulnerability study into the integrated schedule.

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JPN-88-005

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11555 Rockville Pike
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Attachment 1 to JPN-88-005

Response to Generic Letter 88-02

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Indian Point 3 Nuclear Power Plant

Utility: New York Power Authority

Individual Contact Name: J. A. Gray, Jr. Phone Number: 914-681-6289

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5. Question: Do you have any potential concerns about participating in ISAP II?

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John C. Brons
Executive Vice President
Nuclear Generation

February 22, 1988
JPN-88-005

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Integrated Safety Assessment Program II (ISAP II)

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11555 Rockville Pike
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Attachment 1 to JPN-88-005

Response to Generic Letter 88-02

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Indian Point 3 Nuclear Power Plant

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