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December 26, 1991  
JPN-91-070  
IPN-91-045

U.S. Nuclear Regulatory Commission  
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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  
Individual Plant Examination of External Events

- References:
1. NRC Generic Letter 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities," dated June 28, 1991.
  2. NYPA Letter, J.C. Brons to the NRC (IPN-89-066/JPN-89-069), "Individual Plant Evaluations," dated October 27, 1989.
  3. NYPA Letter, R.E. Beedle to the NRC (JPN-91-048), "Individual Plant Examination," dated September 13, 1991.
  4. NRC Letter, J.E. Richardson to W.H. Rasin of the Nuclear Management and Resources Council, dated December 17, 1991.

Dear Sir:

As requested by Reference 1, this letter provides the Authority's plans for performing the Individual Plant Examinations of External Events (IPEEE) for the Indian Point 3 and James A. FitzPatrick Nuclear Power Plants. This letter also provides a revised date for submitting the Indian Point 3 Individual Plant Examination (IPE) for internal events. The Indian Point IPE for internal events will be submitted by March 31, 1994 instead of September 1, 1992. The primary reason for this change in schedule is the large work load of the Authority's Nuclear Systems Analysis group, the group responsible for performing probabilistic risk analyses associated with Generic Letter 88-20 and its supplements.

In Reference 2, the Authority stated that personnel resources required for the Indian Point IPE for internal events would become available upon completion of the FitzPatrick IPE for internal events. The FitzPatrick IPE for internal events has recently been

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completed (Reference 3), nine months later than originally anticipated. Therefore, personnel have just recently become available to begin work on the Indian Point IPE for internal events. In addition, the Authority's Nuclear Systems Analysis group will continue to be involved with the maintenance of the FitzPatrick IPE for internal events and its application towards evaluating potential plant modifications.

The Nuclear Systems Analysis group will also be performing the tasks requested by Reference 1. As the Indian Point 3 IPE for internal events nears completion, the Nuclear Systems Analysis group will begin the IPEEE for the FitzPatrick plant, followed by the IPEEE for the Indian Point 3 plant. This sequence was selected since the FitzPatrick plant has not undergone any systematic examination for vulnerabilities to external events, whereas the Indian Point 3 plant was previously evaluated.

The IPEEEs for the FitzPatrick and Indian Point 3 plants will assess the five external events listed in Reference 1 (seismic events, internal fires, high winds and tornadoes, external floods, and transportation and nearby facility accidents). Of these five initiating events, the Authority currently believes that only seismic events and internal fires may contribute to severe accident risk. However, the other listed events will be assessed and other, non-listed events, will be screened to ensure that there are no plant-unique external events which have a significant probability of initiating a severe accident.

The analysis techniques selected for the FitzPatrick and Indian Point 3 IPEEEs are described below. At this time, methodologies have been determined for only seismic events and internal fires. The examinations for the other external events will be consistent with NUREG-1407.

### SEISMIC EVENTS

For the purpose of IPEEE, the FitzPatrick plant is classified in Reference 1, Table 3.1 as a 0.3 g Focused Scope plant and the Indian Point 3 plant is classified as a 0.3 g Full Scope plant. The Authority will examine the FitzPatrick and Indian Point 3 plants for their ability to safely shutdown and provide core cooling during a postulated 0.3 g review level earthquake. The NRC's Seismic Margin Assessment method described in NUREG/CR-4334 and NUREG/CR-4482 will be used for these examinations.

Both the FitzPatrick and Indian Point 3 plants are members of the Seismic Qualification Utility Group (SQUG) for the purpose of implementation of the resolution of Unresolved Safety Issue (USI) A-46. Because of the similarities of the two programs, the Authority plans to conduct the seismic IPEEE and A-46 walkdowns at the same time as recommended by the NRC in Reference 1. The FitzPatrick IPEEE/A-46 walkdown is currently scheduled to be performed during the October 1993 refueling outage, and the Indian Point IPEEE/A-46 is scheduled to be performed during the March 1994 refueling outage.

The NRC states in Reference 4 that utilities affected by the USI A-46 supplemental safety evaluation report (SSER) for the SQUG Generic Implementation Procedure can submit a supplement to their IPEEE program plan after the USI A-46 SSER is issued. Since both of the Authority's plants are affected by the USI A-46 SSER, the Authority may need to change the walkdown schedule provided above and the IPEEE schedule provided later in this letter. Under this circumstance, the Authority will provide the NRC with a revised schedule 120 days following receipt of the SSER.

FIRE

For both the FitzPatrick and Indian Point 3 plants, the EPRI Fire-Induced Vulnerability Evaluation (FIVE) methodology is expected to be employed. This methodology was just recently approved by the NRC.


SCHEDULE

The Authority's current schedule for completion of the Individual Plant Examinations are as follows:

<u>Event</u>	<u>Date</u>
IP3 Internal Events IPE	March 31, 1994
JAF External Events IPEEE	December 31, 1995
IP3 External Events IPEEE	December 31, 1996

Should you have any questions, please contact Mr. J. A. Gray, Jr. or Mr. P. Kokolakis.

Very truly yours,

  
Ralph E. Beedle  
Executive Vice President  
Nuclear Generation

STATE OF NEW YORK  
COUNTY OF WESTCHESTER

Subscribed and Sworn to before me  
this 26<sup>th</sup> day of December 1991

Barbara Ann Taggart  
Notary Public

BARBARA ANN TAGGART  
NOTARY PUBLIC, State of New York  
No. 4851437  
Qualified in Putnam County  
Commission Expires Jan, 27, 1994

cc: See next page

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