

123 Main Street
White Plains, New York 10601
914 681.6840
914 287.3309 (FAX)



James Knubel
Senior Vice President and
Chief Nuclear Officer

September 23, 1997
IPN-97-129
JPN-97-030

David L. Meyers, Chief
Rules Review and Directive Branch
Office of Administration
Mail Stop T-6D59
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

Subject: James A. FitzPatrick Nuclear Power Plant
Docket No. 50-333
Indian Point 3 Nuclear Power Plant
Docket No. 50-286
Comments on Draft Guidance for Power Reactor Licensees on Using
Risk Information for Licensing Basis Changes

References: See below.

Dear Sir:

The Authority has reviewed the referenced documents pursuant to the June 25, 1997 Federal Register Notice. The Westinghouse Owners Group, BWR Owners Group and the Nuclear Energy Institute have also reviewed these documents and are providing comments to the NRC. The Authority endorses the comments submitted by these organizations.

Areas of sufficient interest to merit specific comments by the Authority are as follows:

- Please clarify or revise the definition of "risk neutral". Defining "risk neutral" as a 0.0 change in core damage frequency (CDF) is overly conservative, even for plants with a CDF greater than 10^{-4} per year.
- Facilities with a CDF greater than 10^{-4} per year should be allowed slight increases in the CDF provided that the overall trend in CDF is downward. For example, if a facility with a

9709300355 970923
PDR ADDCK 05000286
P PDR



1/0
A001

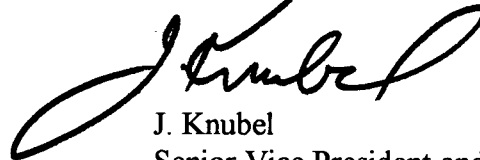
CDF of 1.5×10^{-4} per year implements a change that lowers the CDF to 1.1×10^{-4} , a subsequent change to the facility that increases the CDF to 1.2×10^{-4} would be unacceptable according to the draft guidance, even though the overall trend in CDF is downward.

- The draft guidance states that risk-informed activities should maintain the principles of "defense-in-depth" and sufficient safety margins. The need to perform uncertainty analysis in addition to maintaining these principals appears to be redundant.

The Authority urges the NRC to revise or clarify areas of the draft documents to address these particular concerns and those provided by the above mentioned industry organizations.

No commitments are being made by the Authority in this submittal. If you have any questions concerning this matter, please contact Ms. C. D. Faison.

Very truly yours,



J. Knubel
Senior Vice President and
Chief Nuclear Officer

cc: Regional Administrator
U.S. Nuclear Regulatory Commission
475 Allendale Road
King of Prussia, PA 19406

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
P.O. Box 337
Buchanan, NY 10511

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
P.O. Box 136
Lycoming, NY 13093

Mr. George F. Wunder, Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
U.S. Nuclear Regulatory Commission
Mail Stop 14B2
Washington, DC 20555

Ms. K. Cotton, Acting Project Manager
Project Directorate I-1
Division of Reactor Projects - I/II
U.S. Nuclear regulatory Commission
Mail Stop 14B2
Washington, DC 20555

- References:
1. Draft Regulatory Guide DG-1061 "An Approach for Using Probabilistic Risk Assessment in Risk-Informed Decisions on Plant-Specific Changes to the Current Licensing Basis".
 2. Draft Standard Review Plan (SRP) Chapter 19 "Use of Probabilistic Risk Assessment in Risk-Informed Decisionmaking: General Guidance".
 3. Draft Regulatory Guide DG-1062, "An Approach for Plant-Specific Risk-Informed, Decision Making: Inservice Testing".
 4. Draft SRP Chapter 3.9.7, "Risk-Informed Inservice Testing Applications".
 5. Draft Regulatory Guide DG-1064, "An Approach for Plant-Specific, Risk-Informed Decision Making: Graded Quality Assurance".
 6. Draft Regulatory Guide DG-1065, "An Approach for Plant Specific, Risk-Informed Decision Making: Technical Specifications".
 7. Draft SRP Chapter 16.1 "Risk-Informed Decisionmaking: Technical Specifications".
 8. Draft NUREG-1602, "Use of PRA in Risk-Informed Applications".