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The Honorable Lando W. Zech, Jr.
Chairman
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Chairman Zech:

SUBJECT: ACRS COMMENTS ON THE INTEGRATED SAFETY ASSESSMENT PROGRAM

During the 327th meeting of the ACRS, July 9-11, 1987, we reviewed the experience gained with the NRC Staff's Integrated Safety Assessment Program (ISAP) pilot program. This topic was discussed during a Subcommittee meeting on July 7, 1987. The ISAP process had also been discussed during our 279th meeting in July 1983, as reported in our letter to Chairman Palladino of July 12, 1983. In our review, we had the benefit of discussions with the NRC Staff and industry representatives and of the documents referenced.

The ISAP is intended as a cooperative program, between the NRC Staff and a licensee, which provides for the optimized resolution of multiple safety issues. The program would permit a licensee to develop an integrated plan for implementing plant improvements in response to outstanding safety issues. It would be based on a comprehensive list of issues, an assessment of the plant's operating experience, and a plant-specific risk analysis. The ISAP concept grew out of the Systematic Evaluation Program (SEP), which was highly successful in upgrading the ten oldest licensed plants to conformance with current regulatory requirements.

The ISAP pilot program was carried out for Millstone Unit 1 and Haddam Neck by Northeast Nuclear Energy Company (NNECO) and the NRC Staff. The NRC Staff has issued a draft Integrated Safety Assessment Report (ISAR) for Millstone Unit 1 and will soon issue the draft ISAR for Haddam Neck. The NRC Staff is preparing recommendations to the Commission for the future use of the ISAP process based on an analysis of the lessons learned from the pilot program.

Experience with the ISAP pilot program demonstrates that the process is useful and provides an excellent mechanism for the implementation of regulatory requirements. The NRC Staff and NNECO appear to agree on the usefulness of ISAP. We recommend that the ISAP process be extended to other plants.

The NRC Staff has not yet completed the development of the procedures by which the ISAP process would be implemented more broadly. The methods used in the pilot program were successful. However, several points need to be considered further:

- (1) the application of the process to plants that were not in the SEP

- (2) the coordination with the Individual Plant Examination program under the Severe Accident Policy implementation
- (3) the appropriate scope for the risk analysis to be used as part of ISAP

We would like to review the NRC Staff's proposal for future use of the ISAP when it is available.

Sincerely,

William Kerr
Chairman

References:

1. U.S. Nuclear Regulatory Commission, NUREG-1184, "Integrated Safety Assessment Report," Draft Report, April 1987
2. Northeast Utilities, "Integrated Safety Assessment Program, Haddam Neck Plant," Volumes 1 to 3, Final Report, December 1986
3. Northeast Utilities, "Integrated Safety Assessment Program, Millstone, Unit 1," Volumes 1 to 3, Final Report, July 1986
4. Northeast Utilities Service Company, NUSCO 149, "Connecticut Yankee Probabilistic Safety Study," Volumes 1 to 4, February, 1986
5. Northeast Utilities Service Company, NUSCO 147, "Millstone, Unit 1, Probabilistic Safety Study," Volumes 1 to 3, July 1985

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