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James D. Shiffer
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March 17, 1989

PG&E Letter No. DCL-89-062

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

Attention: R. W. Houston

Re: Docket No. 50-275, OL-DPR-80
Docket No. 50-323, OL-DPR-82
Diablo Canyon Units 1 and 2
Comments on NUREG-1335, Individual Plant Examinations

Gentlemen:

At the meeting in Ft. Worth, Texas on February 23 - March 2, 1989, regarding draft NUREG-1335 on Individual Plant Examinations (IPEs), the NRC Staff requested that utilities wishing to submit formal comments on the NUREG provide such submittals by March 17, 1989. PG&E understands that NUMARC is submitting comments to the NRC on this subject. In general, PG&E supports the comments being provided by NUMARC. Additionally, PG&E submits the following further comments, particularly with regard to Diablo Canyon:

1. NUREG-1335 specifies a standard format and content for IPE submittals.

   Many utilities have already submitted PRAs that have been approved by the NRC Staff or are currently under review (including Diablo Canyon). In accordance with Generic Letter (GL) 88-20, these utilities are expected to use the PRAs in responding to the IPE requirements. For these plants, it is not necessary or feasible to reformat or revise the contents of their PRA reports to follow that specified in NUREG-1335. The NUREG should be clarified to allow the use of these previous PRA submittals without revision in response to GL 88-20. The only requirements may be, as stated by the Staff in the Ft. Worth meeting and in NUREG-1335, that the utilities certify that the PRAs are up to date and that utility personnel participated in and are familiar with their PRA analyses.

2. The Staff stated in the Ft. Worth meeting that a review guidance document, currently being prepared within NRC for the review of utility IPE submittals, is scheduled to be issued shortly.

   PG&E believes that current and prior Staff reviews performed for PRAs should be sufficient to function as the review for IPE requirements and, therefore, no further review should be

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required. Any additional review should be limited to only those portions of supplemental information that might need to be submitted to address issues that were not considered in the original PRAs. Accordingly, NUREG-1335 should first be clarified, prior to publication of the review guidance, to indicate that additional Staff reviews of previously submitted PRAs for IPE compliance will not be necessary; such reviews may be required only where additional submittals are involved.

3. GL 88-20 specifies that a program plan for implementing the IPE be submitted by utilities within 60 days of issuance of the final NUREG-1335.

   Due to the extensive nature of comments voiced at the Ft. Worth meeting by numerous participants, it is apparent that significant effort will be required to evaluate the guidance of NUREG-1335 once it is issued in final form. For this reason, PG&E believes that additional time should be allowed for the preparation of a program plan following the finalization of NUREG-1335. A period of 90 days or longer may be more appropriate than the currently stated 60 days. Additional workshops between NRC and utilities to review the NUREG also appear advisable. Further, NUREG-1335 should clarify the NRC's intent with respect to the review or approval of the program plans.

Kindly acknowledge receipt of this material on the enclosed copy of this letter and return it in the enclosed addressed envelope.

Sincerely,

W. B. Kaefer for

J. D. Shiffer

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