

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9201020004    DOC. DATE: 91/12/23    NOTARIZED: YES    DOCKET #  
 FACIL: 50-275 Diablo Canyon Nuclear Power Plant, Unit 1, Pacific Ga    05000275  
 50-323 Diablo Canyon Nuclear Power Plant, Unit 2, Pacific Ga    05000323

AUTH. NAME                      AUTHOR AFFILIATION  
 FUJIMOTO, W.H.                  Pacific Gas & Electric Co.  
 RECIPIENT NAME                  RECIPIENT AFFILIATION  
    Document Control Branch (Document Control Desk)

SUBJECT: Forwards response to Generic Ltr 88-20, Suppl 4, Individual Plant Exam of External Events for Severe Accident Vulnerability. Util will examine potential internal fire vulnerabilities using PRA approach.

DISTRIBUTION CODE: A011D    COPIES RECEIVED: LTR 1 ENCL 1    SIZE: 3  
 TITLE: Generic Ltr 88-20 re Individual Plant Evaluations

NOTES:

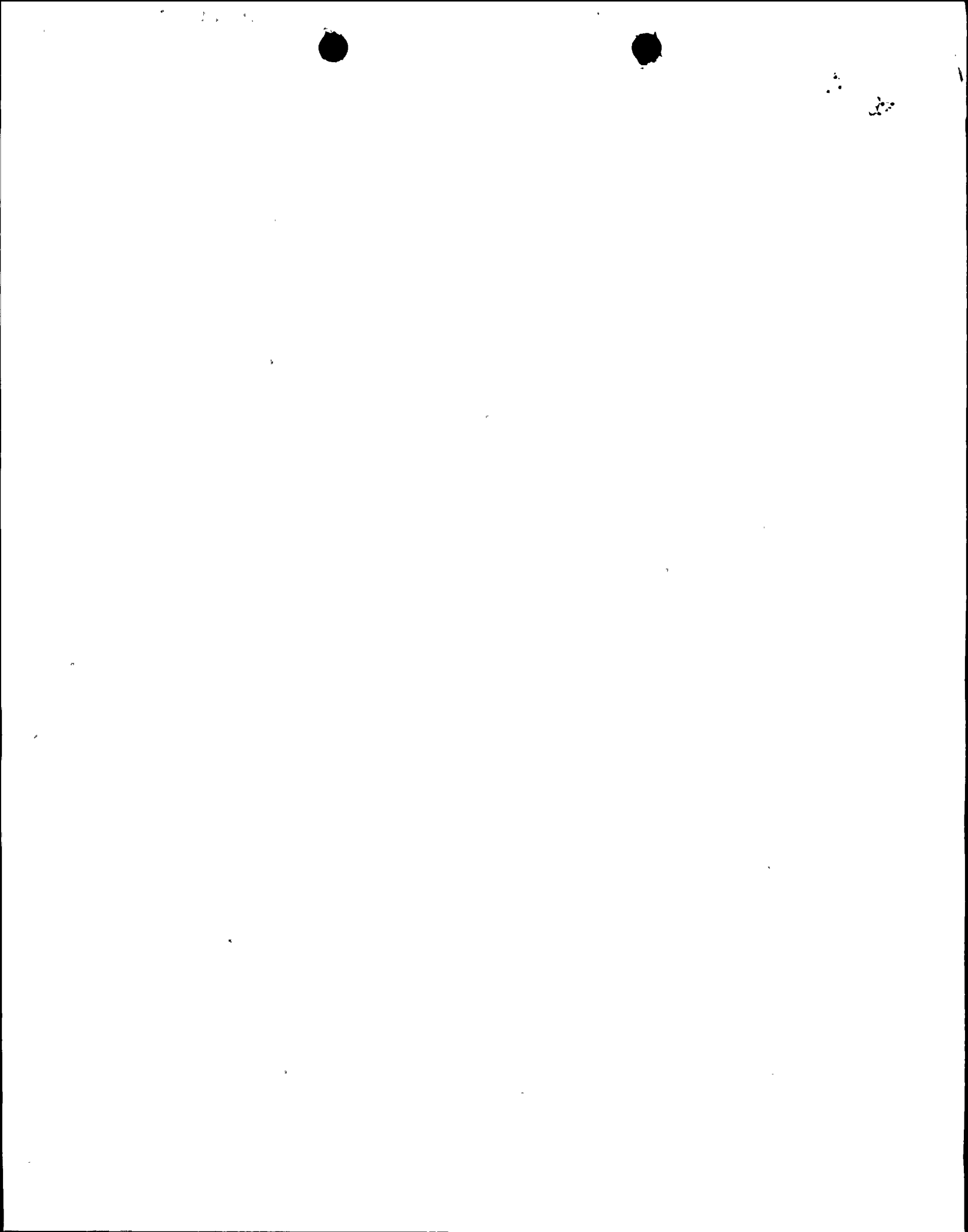
	RECIPIENT ID CODE/NAME	COPIES	LTR	ENCL	RECIPIENT ID CODE/NAME	COPIES	LTR	ENCL
	PD5 PD	1		1	ROOD, H	1		1
INTERNAL:	ACRS HOUSTON, M.	1		1	AEOD/DSP/TPAB	1		1
	NRR HERNAN, R.	1		1	NRR/DREP/PRAB	2		2
	REG 1	1		1	REG 2	1		1
	REG 3	1		1	REG 4	1		1
	<del>REG ELLE</del>	1		1	RES FLACK, J.	6		6
	RES MITCHELL, J.	1		1	RES/DSIR/SAIB/B	7		7
EXTERNAL:	NRC PDR	1		1	NSIC	1		1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTR    28    ENCL    28

R  
I  
D  
S  
/  
A  
D  
D  
S  
  
R  
I  
D  
S  
/  
A  
D  
D  
S



Pacific Gas and Electric Company

333 Market Street, Room A-2421  
San Francisco, CA 94106  
415/973-0600  
Fax 415/973-1427

Warren H. Fujimoto  
Vice President  
Nuclear Technical Services

December 23, 1991

PG&E Letter No. DCL-91-308



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

Re: Docket No. 50-275, OL-DPR-80  
Docket No. 50-323, OL-DPR-82  
Diablo Canyon Units 1 and 2  
Response to Generic Letter 88-20, Supplement 4  
Individual Plant Examination of External Events Program Plan

Gentlemen:

In response to Generic Letter 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities," PG&E hereby submits its IPEEE Program Plan for the Diablo Canyon Power Plant. PG&E intends to complete and submit the results of the IPEEE by June 28, 1994, as requested in the generic letter.

Sincerely,

Warren H. Fujimoto

Subscribed and sworn to before me  
this 23th day of December 1991.

Attorneys for Pacific Gas and  
Electric Company  
Howard V. Golub  
Christopher J. Warner

  
Adriane D. Tolefree, Notary Public  
Christopher J. Warner

cc: Ann P. Hodgdon  
John B. Martin  
Philip J. Morrill  
Harry Rood  
Howard J. Wong  
CPUC  
Diablo Distribution



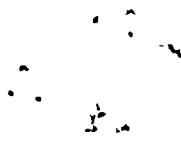
Enclosure

5578S/85K/RLT/2232

9201020004 911223  
PDR ADDCK 05000275  
PDR

200112

AD11



## ENCLOSURE

## INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS

## PROGRAM PLAN

Introduction

This enclosure provides the Diablo Canyon Power Plant Individual Plant Examination of External Events Program Plan in response to Generic Letter (GL) 88-20, Supplement 4, "Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities." PG&E's IPEEE program will be completed within a three-year period (by June 28, 1994), as requested in the GL.

The GL identified five external events that should be addressed as part of the IPEEE. These are:

- Seismic Events
- Internal Fires
- High Winds and Tornadoes
- External Floods
- Transportation and Nearby Facility Accidents

PG&E's approaches for evaluating these external events are discussed in the following sections.

Seismic Events

Consistent with the guidance provided in NUREG-1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events for Severe Accident Vulnerabilities," PG&E will examine potential seismic vulnerabilities using probabilistic risk assessment (PRA) methodology and site specific hazard curves. We have performed an extensive seismic PRA as part of the Long Term Seismic Program (LTSP). This assessment was required as a condition for issuance of the Diablo Canyon Unit 1 Operating License. This seismic PRA was extensively reviewed by the NRC and Brookhaven National Laboratory (BNL). The NRC acceptance of the results of the Seismic PRA is documented in Supplement No. 34 (June 1991) to the Diablo Canyon Safety Evaluation Report (NUREG-0675).

We believe that the existing seismic PRA developed as part of the LTSP satisfies the IPEEE requirements. We will, however, review the existing PRA and, as necessary, provide enhancements to meet the intent of the IPEEE. This will include consideration of containment performance issues.

Internal Fires

Consistent with the guidance provided in NUREG-1407, PG&E will examine potential internal fire vulnerabilities using a PRA approach. Internal fires were previously evaluated as part of the LTSP using a PRA approach. We believe the existing fire PRA largely meets the IPEEE requirements. Nonetheless, PG&E will review the issues identified by the Fire Risk Scoping



10

11

12

Study (NUREG/CR-5088) and will, where appropriate, update the existing fire PRA to address these issues.

### Other External Events

High winds and tornadoes, external floods, and transportation and nearby facility accidents were also evaluated as part of the PRA performed for the LTSP. We believe the existing PRA analysis meets the IPEEE requirements and intend to use it for the IPEEE. As part of the scope of our IPEEE Program Plan, a review will be performed to ensure that no changes have occurred at the plant that would impact the existing PRA analysis for Other External Events. Where appropriate, enhancements will be made to the existing PRA to address any identified changes at the plant or to make improvements to the PRA models.

### Summary

PG&E will use its existing PRA to address the IPEEE for Diablo Canyon Power Plant. Where necessary, enhancements will be made to the existing PRA. Since the Diablo Canyon PRA has been submitted to the NRC and the NRC Staff has reviewed the PRA, PG&E plans to use a "road map" approach to provide the necessary documentation in its IPEEE submittal. PG&E plans to submit the IPEEE for Diablo Canyon by June 28, 1994.



Handwritten marks or text in the top right corner, appearing as a series of small, irregular characters.

A small, faint handwritten mark or character located in the center of the page.