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SUBJECT: Forwards util response to Generic Ltr 88-02 format re ISAP II.

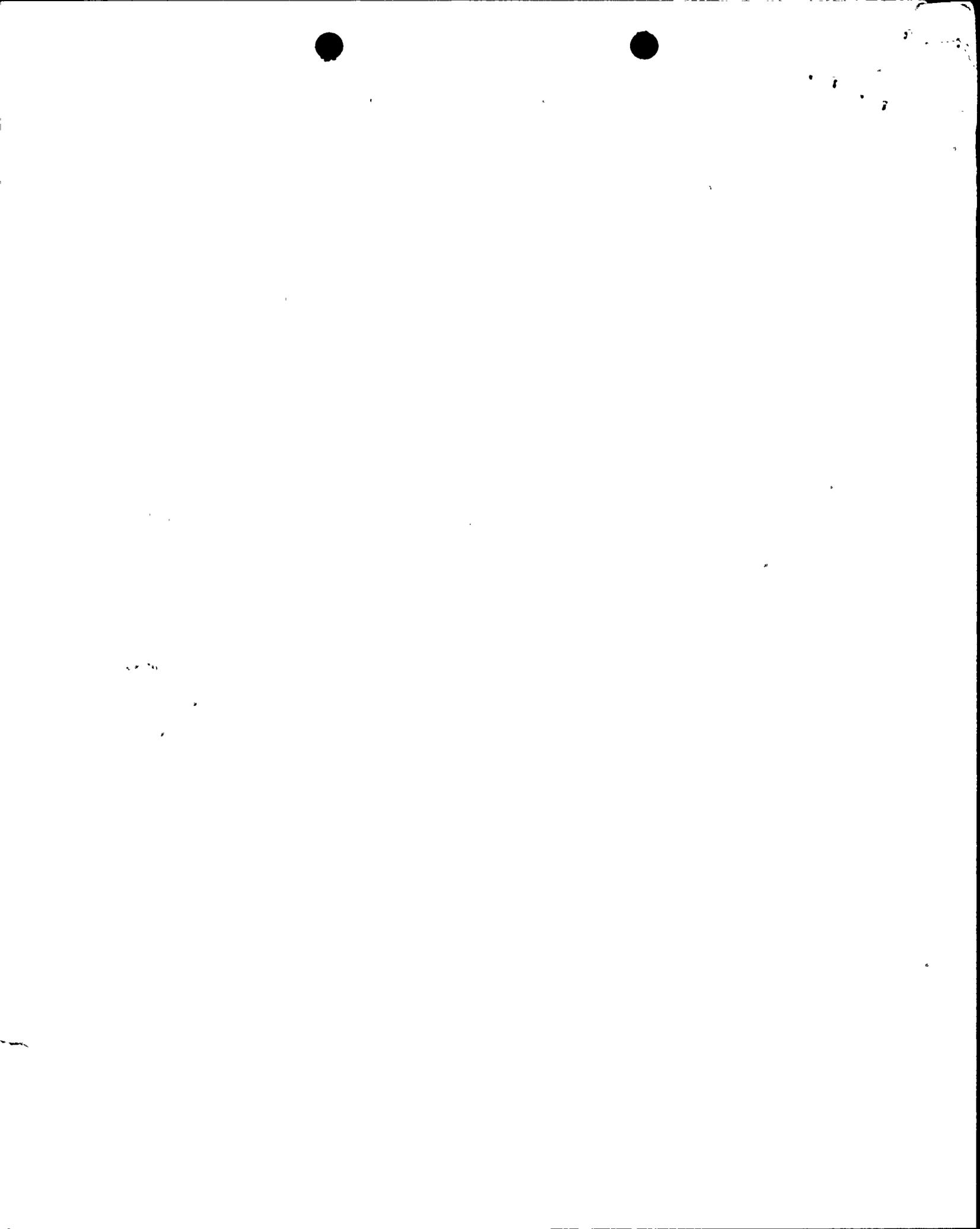
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February 19, 1988
NMPIL 0227U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Gentlemen:

Niagara Mohawk was pleased to see Generic Letter 88-02 issued regarding the Integrated Safety Assessment Program II (ISAP II). We closely followed the Systematic Evaluation Program (SEP) from its inception and have initiated engineering evaluations of the lessons learned from SEP Phase II. Additionally, we were closely involved with the original ISAP program and have communicated our interest in that program in the past. We support a program of integration of owner and regulatory schedules based on sound criteria.

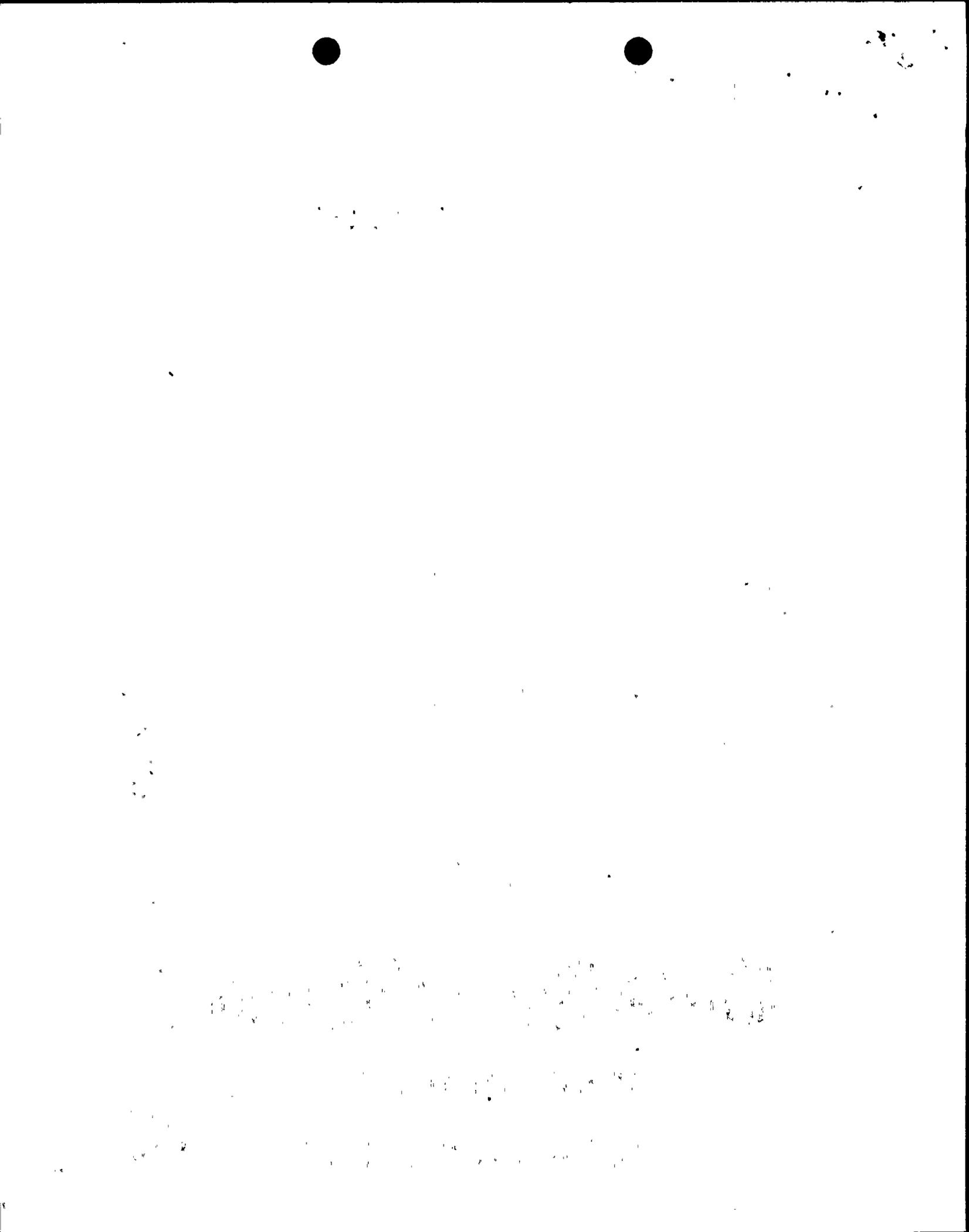
We are interested in participating in ISAP II for Nine Mile Point Unit 1 with some reservations. These reservations are detailed in the attachment to this letter, which is in the format found in the Generic Letter. In summary, we need more information regarding the program's scope, schedule, and engineering acceptance criteria before we could make a definitive commitment. If the program develops acceptably, however, we would also consider Nine Mile Point Unit 2 for participation.

We look forward to receiving further communications from you about ISAP II.

Very truly yours,

NIAGARA MOHAWK POWER CORPORATION

C. V. Mangano
C. V. Mangano
Senior Vice PresidentDAC/pns/4518G
Attachmentcc: Regional Administrator, Region I
Mr. R. A. Capra, Director
Mr. R. A. Benedict, Project Manager
Mr. W. A. Cook, Resident Inspector8802290334 880219
PDR ADOCK 05000220
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ATTACHMENT

Integrated Safety Assessment Program (ISAP) II

Response Format to Generic Letter 88-02

Facility Name: Nine Mile Point Unit 1
Utility: Niagara Mohawk Power Corporation
Individual Contact Name: Mr. Daniel A. Cifonelli
Phone Number: (315) 428-7386

An expression of interest will not be considered a commitment to participate on the part of the utility.

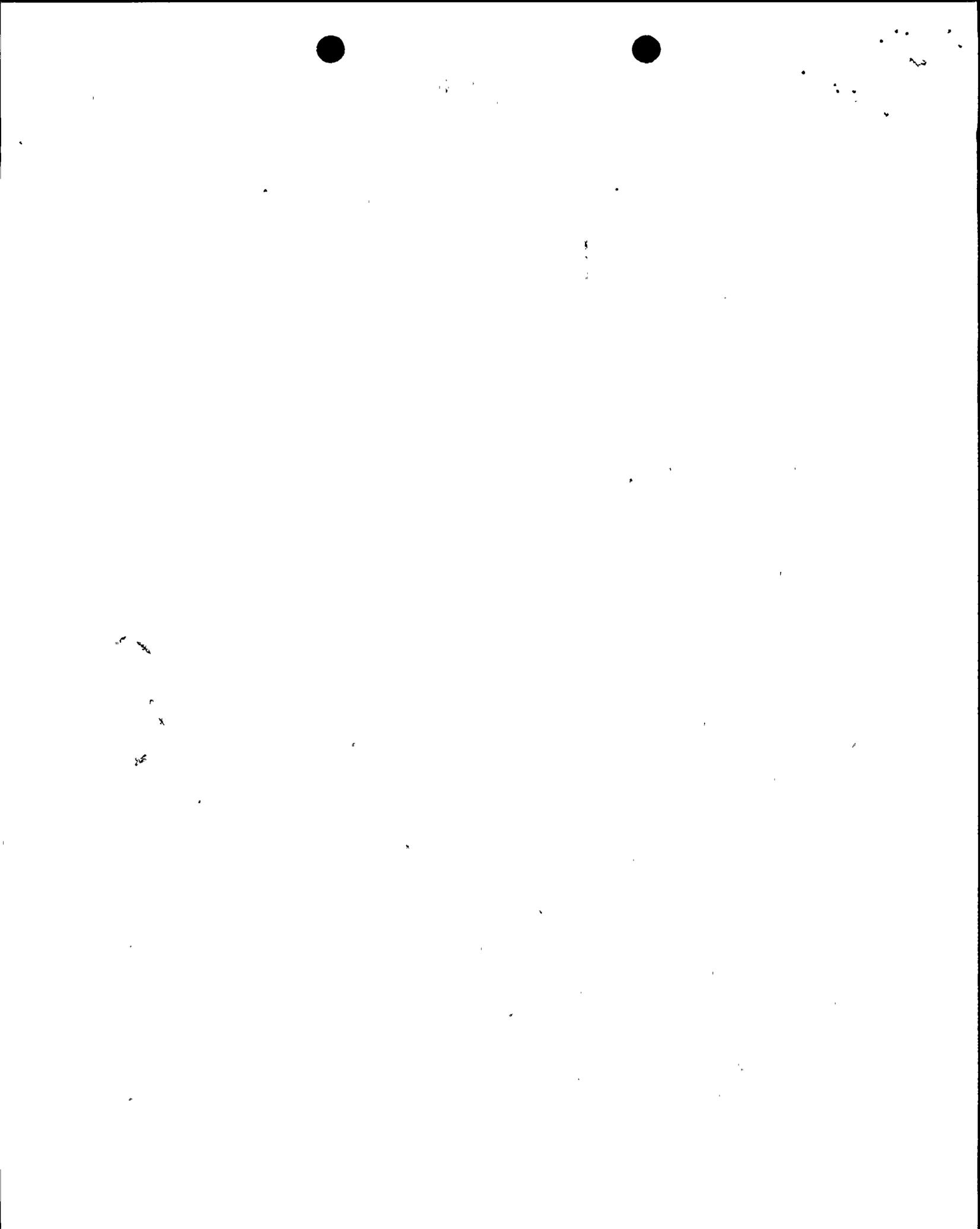
1. Would you be interested in participating in ISAP II? If so, in what time frame?

In general, yes with some reservations. We are in complete agreement with the general concept of an integrative scheduling approach. Our reservations are with the details of the program and its implementation. We need more information about the new program before we could commit.

We are concerned with the expressed and anticipated changes in the program details from the original ones we had previously discussed. (See our letters of October 19, 1983, April 24, 1984, and July 2, 1985.) If given assurance that the acceptance criteria used in the engineering evaluation of each issue and the scope of the issues are similar to the original program, then our interest would be high. Until this program is defined to the extent it was before, we cannot make a well reasoned decision.

Regarding time frames for implementation, until the program is specified in more detail, we find it difficult to schedule the program milestones. Nevertheless, for your information, our initial assessment of the time needed to complete an Individual Plant Examination (IPE) (corresponding to a Level 2 PRA) would be about a year and a half.

Additionally, because of a limited number of qualified personnel, the same people will probably be involved with both Units. Therefore, the efforts will have to be scheduled in series, not in parallel. In other words, we would plan to complete one Unit's PRA/IPE before beginning the second Unit's PRA/IPE. Additionally, because of the differences in vintage between the Units, we plan to complete Unit 1's PRA/IPE before Unit 2's.



We are also concerned with the tentative schedule referenced in the Generic Letter. Based on our experience, we believe this is overly optimistic. We could not commit to such a schedule, and we question the NRC's capability in meeting this proposed schedule. The process will initially require a heavy loading of utility and NRC resources. We feel a realistic schedule ought to reflect this.

2. Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial to making a decision?

Yes. At minimum, we would desire this information to make a decision. However, we also feel that a NRC presentation type of meeting would not be enough to make a well reasoned decision. We desire a dialogue with free exchange of information. This would help set the tone for the entire program, which implies close communication regarding the licensing process.

We need to freely exchange ideas on the development of the ground rules of the program. This would not only help build confidence that such an integrative approach is feasible, but also would help to define a program that is truly beneficial to both the utility and the regulator.

An initial free exchange of information is of particular interest to our personnel that were involved with the original program. They feel that they played a major role in the development of the initial program and, therefore, would make a valuable contribution to the development of the new ISAP II program. Finally, this type of exchange may be necessary to alleviate our current reservations.

3. Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility?

Yes. Our answer to question #2 elaborates on this question. In summary, we feel that a major issue surrounding the entire program is communication. Therefore, to get the program off on the right foot, effective communication regarding the details of the program should be established as soon as possible. Additionally, we would hope that an integrative approach would include participation with our Resident Inspectors and our Project Managers.

Furthermore, we feel we need assistance in interpreting the details of the new program and a one-on-one meeting could help in this matter. For instance, the letter implies that the program's objectives are the same as they were before, with some differences in implementation. One difference pointed out is the removal of the requirement to evaluate against SEP criteria. This alone, based on our interpretation, may be a significant difference in the new program. Does this mean that SEP criteria cannot be used?



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4. If you remain undecided regarding participation, what additional information do you need in order to make a decision?

Basically, we have answered this question above. In summary, we need to know the program's ground rules. They are not clearly established in sufficient detail in your Generic Letter. We need to know the scope of the program, the schedule, and the engineering evaluation acceptance criteria, among other things. These concerns need to be addressed before we can make a rational decision.

We are also concerned about the NRC's commitment to provide adequate and consistent resources to this program. This concern is based on our past involvement with the program. We would like additional assurance that the program has sufficient support to carry it through the long term.

5. Do you have any potential concerns about participating in ISAP II?

Besides these which were previously mentioned, we have some internal concerns that we need to completely address. These include evaluation of the issues discussed above, along with a definitive evaluation of our interest and resources to support the program. We are currently working on an internally integrative scheduling approach that could be folded into the new ISAP II program. These and other concerns require that we have some time for internal evaluation.

6. Do you have any suggestions for program improvements or changes?

Besides what we have already discussed, we find this a difficult question to answer without knowing the current program's ground rules. We, however, would like to note our past discussions of the original ISAP program as additional suggestions for improvement. Additional comments are found in our submittals dated October 19, 1983, April 24, 1984, and July 2, 1985. Finally, we would like to emphasize the need for more information, the development of detailed ground rules, and the need for upfront participation among Utility Representatives, ISAP II NRC Program Management, Resident Inspectors, and Project Managers.

In conclusion, before volunteering with ISAP II, we want to confirm that many of the details of the original program are preserved and that the benefits to Niagara Mohawk have not been lost. Of particular concern is the apparent lack of criteria for evaluating outstanding issues. Typically, each regulatory requirement has its own unique set of criteria ranging from the initial plant licensing basis to current regulatory criteria, and often each has its own group of regulatory reviewers. We will not volunteer to participate in a program with this range of uncertainty. For example, with the original ISAP program we were confident that certain Nine Mile 1 issues would be evaluated against the SEP criteria. We believe this is an important parameter associated with the success of the Millstone 1 and the Haddam Neck programs. Therefore, specific and acceptable ISAP II criteria must be developed.



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