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SUBJECT: Forwards milestones/schedule for completing individual plant
 exams of external events for severe accident
 vulnerabilities, per Suppl 4 to Generic Ltr 88-20. Individual
 plant exams expected to be completed by 920731.

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December 20, 1991
NMP1L 0631

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

Re: Nine Mile Point Unit 1
Docket No. 50-220
DPR-63

Nine Mile Point Unit 2
Docket No. 50-410
NPF-69

Gentlemen:

SUBJECT: Individual Plant Examination of External Events (IPEEEs) for Severe Accident Vulnerabilities (Generic Letter No. 88-20, Supplement 4)

The Commission, by way of Generic Letter 88-20, Supplement 4, requested Licensees to perform an Individual Plant Examination of External Events (IPEEEs) to identify vulnerabilities, if any, to severe accidents due to external events. Supplement 4 indicated that Licensees should submit their proposed programs for completing their IPEEEs to the Commission within 180 days. Specifically, Supplement 4 of this generic letter indicated that the submitted programs identify the methods selected as well as the milestones/schedules for performing the IPEEEs. Enclosures 1 and 2 provide the proposed IPEEE programs for Nine Mile Point Unit 1 and Unit 2, respectively.

Very truly yours,



C. D. Terry
Vice President
Nuclear Engineering

JT/mls
002161GG

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ENCLOSURE 1

NINE MILE POINT UNIT 1

INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS

MILESTONES/SCHEDULE FOR COMPLETING IPEEE

<u>MILESTONES</u>	<u>SCHEDULE</u>
Individual Plant Examination (IPE) Complete	July 31, 1993
IPE Application/Integration Complete	January 31, 1994
Fire Documentation and Review Complete	December 31, 1995
Seismic Documentation and Review Complete	December 31, 1995
"Others" Documentation and Review Complete	January 31, 1996
IPEEE Evaluation and Final Report Complete	August 31, 1996

GL 88-20, Supplement 4, requested Licensees to submit their Individual Plant Examination of External Events (IPEEEs) results by June 28, 1994. However, as indicated above, Nine Mile Point Unit 1 (NMP1) IPEEE work is scheduled for completion by August 31, 1996. Niagara Mohawk proposes the above IPEEE program schedule based on the following:

- 1 NMP1's Individual Plant Examination (IPE) application/integration work is not currently scheduled to be completed until January 31, 1994. Niagara Mohawk has expended significant resources in developing the NMP1 IPE and believes it is a priority to integrate IPE into our day-to-day activities. Therefore IPE integration work has been scheduled to begin immediately after IPE work is completed. Accordingly, Niagara Mohawk believes that available resources should be directed towards completing the IPE integration work prior to beginning IPEEE work.
- 2 Additional resource restraints will be present due to work on Nine Mile Point Unit 2's (NMP2) IPEEE effort. Completion of the IPEEE effort prior to August 31, 1996, would require the use of resources external to Niagara Mohawk. Niagara Mohawk prefers to use internal resources to perform IPEEE work so that the experience and knowledge gained will remain with the licensee.
- 3 Several IPEEE required walkdowns must be performed during a refueling outage. NMP1's 1994 Refueling Outage is the most practical time frame to perform this work.



METHODS/APPROACH FOR COMPLETING IPEEE

Seismic Events - A seismic IPEEE can be accomplished by performing a seismic Probabilistic Risk Assessment (PRA) with enhancements or by using one of two seismic margin methods with enhancements. Nine Mile Point Unit 1 seismic IPEEE will be accomplished by using the Seismic Margins Method (SMM) with enhancements as developed by EPRI and as described in EPRI report NP-6041.

Internal Fires

The NMP1 internal fires IPEEE will be accomplished by using the EPRI/NUMARC developed Fire Vulnerability Evaluation (FIVE) methodology. As indicated in the Commission's letter dated August 21, 1991, (A. Thadani (NRC) to W. Rasin (NUMARC)) the FIVE methodology is an acceptable alternative for use in the fires IPEEE. Additionally, the recommendations made in the above mentioned letter will be met.

Others IPEEE

The NMP1 "Others" IPEEE will be accomplished by using the approach described in Generic Letter 88-20, Supplement 4, Figure 1, "Recommended IPEEE Approach for Winds, Floods, and Others".

Note - Where the above approaches require a PRA, the PRA Procedures Guide (NUREG/CR-2300) and the plant specific IPE will be used.



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ENCLOSURE 2

NINE MILE POINT UNIT 2

INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS

MILESTONES/SCHEDULE FOR COMPLETING IPEEE

<u>MILESTONES</u>	<u>SCHEDULE</u>
Individual Plant Examination (IPE) Complete	July 31, 1992
IPE Application/Integration Complete	January 31, 1993
Fire Documentation and Review Complete	December 31, 1994
Seismic Documentation and Review Complete	December 31, 1994
"Others" Documentation and Review Complete	January 31, 1995
IPEEE Evaluation and Final Report Complete	August 31, 1995

GL 88-20, Supplement 4, requested Licensees to submit their Individual Plant Examination of External Events (IPEEEs) results by June 28, 1994. However, as indicated above, Nine Mile Point Unit 2 (NMP2) IPEEE work is scheduled for completion by August 31, 1995. Niagara Mohawk proposes the above IPEEE program schedule based on the following:

- 1 NMP2's Individual Plant Examination (IPE) application/integration work is not currently scheduled to be completed until January 31, 1993. Niagara Mohawk has expended significant resources in developing the NMP2 IPE and believes it is a priority to integrate IPE into our day-to-day activities. Therefore IPE integration work has been scheduled to begin immediately after IPE work is completed. Accordingly, Niagara Mohawk believes that available resources should be directed towards completing the IPE integration work prior to beginning IPEEE work.
- 2 Additional resource restraints will be present due to work on Nine Mile Point Unit 1's (NMP1) IPEEE and IPE effort. Completion of the IPEEE effort prior to August 31, 1995, would require the use of resources external to Niagara Mohawk. Niagara Mohawk prefers to use internal resources to perform IPEEE work so that the experience and knowledge gained will remain with the Licensee.
- 3 Several IPEEE required walkdowns must be performed during a refueling outage. NMP2's 1993 Refueling Outage (currently scheduled for the fall of 1993) is the most practical time frame to perform this work.



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METHODS/APPROACH FOR COMPLETING IPEEE

Seismic Events

A seismic IPEEE can be accomplished by performing a seismic Probabilistic Risk Assessment (PRA) with enhancements or by using one of two seismic margin methods with enhancements. The NMP2 seismic IPEEE will be accomplished by using the Seismic Margins Method (SMM) with enhancements as developed by EPRI and as described in EPRI report NP-6041.

Internal Fires

The NMP2 internal fires IPEEE will be accomplished by using the EPRI/NUMARC developed Fire Vulnerability Evaluation (FIVE) methodology. As indicated in the Commission's letter dated August 21, 1991, (A. Thadani (NRC) to W. Rasin (NUMARC)) the FIVE methodology is an acceptable alternative for use in the fires IPEEE. Additionally, the recommendations made in the above mentioned letter will be met.

Others IPEEE

The NMP2 "Others" IPEEE will be accomplished by using the approach described in Generic Letter 88-20, Supplement 4, Figure 1, "Recommended IPEEE Approach for Winds, Floods, and Others".

NOTE: Where the above approaches require a PRA, the PRA Procedures Guide (NUREG/CR-2300) and the plant specific IPE will be used.



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