



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

June 29, 1992

Docket Nos. 50-220
and 50-410

Mr. B. Ralph Sylvia
Executive Vice President, Nuclear
Niagara Mohawk Power Corporation
301 Plainfield Road
Syracuse, New York 13212

Dear Mr. Sylvia:

SUBJECT: REVIEW OF RESPONSE TO GENERIC LETTER 88-20, SUPPLEMENT NO. 4 -
INDIVIDUAL PLANT EXAMINATIONS FOR EXTERNAL EVENTS - NINE MILE POINT
NUCLEAR STATION, UNIT NOS. 1 AND 2 (TAC NOS. M83645 AND M83646)

Supplement 4 to Generic Letter 88-20 was issued on June 28, 1991, to require each licensee and each Construction Permit holder to conduct an individual plant examination of external events (IPEEE). Guidance was provided with the generic letter supplement in the form of NUREG-1407, "Procedural and Submittal Guidance for the Individual Plant Examination of External Events (IPEEE) for Severe Accident Vulnerabilities." The supplement requested a 180-day response (December 26, 1991) that would (1) identify the method and approach selected for the IPEEE, (2) describe the method to be used if it has not previously been submitted for staff review, and (3) identify the milestones and schedule for performing the IPEEE and submittal of the results to the NRC. Licensees were requested in the supplement to submit the IPEEE results to the NRC for review by June 28, 1994, (3 years after issuance of the supplement) to ensure that the intent of the Commission's Severe Accident Policy Statement will be met by mid-1995.

We have reviewed your letter dated December 20, 1992, submitted in response to Generic Letter 88-20, Supplement 4. We find that your selected IPEEE methods are acceptable. However, your submittal schedule is not acceptable. The proposed submittal date is significantly beyond the NRC's requested submittal date of June 1994 and will impact the NRC's schedule for the closure of severe accident issues. We therefore request that you reassess your schedule and report the results no later than September 18, 1992. This date is based on the fact that the staff issued the Supplemental Safety Evaluation Report (SSER) approving the USI A-46 Generic Implementation Procedure (GIP) on May 22, 1992 (Supplement 1 to Generic Letter 87-02). Those plants covered under USI A-46 are required to respond by September 18, 1992, with their USI A-46 program. Most licensees for these plants have linked their IPEEE response to USI A-46.

Note that, through your IPE process, we expect that you are now familiar with Level 1 Probabilistic Risk Assessment (PRA) technology. The information you obtained and expertise you acquired through the IPE process should be used and

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Mr. B. Ralph Sylvia

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built upon to fulfill part of the IPEEE requirements. The staff believes that, with the safety systems and equipment being identified through the IPE process, you should be able to complete the IPEEE significantly sooner than your projected submittal date. Therefore, the staff requests that you reassess your opportunities for submitting your IPEEE results on a more expeditious schedule, preferably either in 1994 or early 1995 but no later than June 1995. Also, by doing so, your efforts will more closely reflect the level of safety significance attributed to this effort by the Commission when the goal of closing severe accident issues by June 1995 was established.

Please inform us of any changes in either the schedule or methodology.

The information requested by this letter is within the scope of the overall burden estimated in Supplement 4 to Generic Letter 88-20 for the IPEEE program, which was a maximum of 6 person-years per licensee response over a 3-year period. This request is covered by Office of Management and Budget Clearance Number 3150-0011, which expires May 31, 1994.

Sincerely,

Donald S. Brinkman
for Robert A. Capra, Director
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page



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Mr. B. Ralph Sylvia
Niagara Mohawk Power Corporation

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Unit Nos. 1 and 2

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Sincerely,

Original Signed By:
Robert A. Capra, Director
Project Directorate I-1
Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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