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SUBJECT: Describes proposed program for completing individual plant exam of external events,per Generic Ltr 88-20,Suppl 4. Planned program includes study of seismic,internal fire,high wind & transportation/nearby facility accidents.

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Project Directorate I-2
Division of Reactor Projects
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Washington, D.C. 20555

SUSQUEHANNA STEAM ELECTRIC STATION
PROPOSED PROGRAM FOR COMPLETION OF IPEEE **Docket Nos. 50-387**
PLA-3703 **FILES R41-2, R41-1D** **and 50-388**

Reference: "Susquehanna Steam Electric Station Proposed Response to Generic Letter 88-20", PLA-3280, dated October 26, 1989.

Dear Mr. Miller:

This letter describes PP&L's proposed program for completing the Individual Plant Examination of External Events (IPEEE) as requested in Generic Letter 88-20, Supplement 4. Included is a description of the scope and methodology of our proposed program, a discussion of milestones, and our planned date of submittal of our results for your review.

Scope

Our planned program includes the study of seismic, internal fire, high wind, external flooding, and transportation/nearby facility accidents. We plan to address seismically generated fires and floods. Because the effect of high winds on losses of off-site power has been incorporated in both the PP&L response to station blackout and the internal events IPE, only the effect of high winds on other plant systems (primarily structures) will be addressed by the IPEEE. As part of the evaluation of external floods, the IPEEE will also review any impact of new National Weather Service precipitation data on roof pond loadings.

In addition, PP&L also plans to address and close out a number of Unresolved Safety Issues (USI) and Generic Issues (GI) through the IPEEE. Specifically, our IPEEE will address USI A-45 entitled "Shutdown Decay Heat Removal Requirement" as applicable for external events. This USI has been addressed for internal events in the IPE. "Effects of Fire Protection System Actuation on Safety-Related Equipment" (GI-57) and the concerns of the "Fire Risk Scoping

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Study" (NUREG/CR-5088) will also be addressed. If in the course of our examination we identify additional USI's or GI"s that we wish to resolve based on the results of our IPEEE, then we will inform you of this through a subsequent submittal.

The IPEEE will take place in the context of being part of PP&L's larger, on-going program of Risk Management. This program is outlined on pages 23 through 27 of the PP&L technical report 89-001 which was previously transmitted to you as an attachment to PLA-3280 (Referenced above). This program is a continuing process of monitoring and evaluation with the goals of minimizing the occurrence of severe accidents, and optimizing the mitigative capabilities of plant operators and their equipment. As part of this larger program, any recommended actions arising from the IPEEE will be evaluated with respect to current activities involving the plant procedures, equipment, risk analysis, internal events IPE, and modifications.

Method

As in the internal events IPE, PP&L plans to use a modified IDCOR support state method combined with a defense-in-depth evaluation (Reference). While the support state method is strictly applicable only for calculations of plant damage state frequency, defense-in-depth evaluations can be employed in both PRA and margin type analyses. As currently envisioned, the selection of desired shutdown paths in the seismic evaluation will be done using defense-in-depth type screening. the defense-in-depth evaluation assures us that multiple equipment failures must occur before fission product barrier breach. Thus, even in a margins type study, we expect qualitative defense-in-depth evaluations to be useful.

In completing the IPEEE, PP&L plans to utilize the approaches discussed in GL 88-20, Supplement 4 and NUREG-1407. Specifically, we plan on performing a seismic margins evaluation using the EPRI methodology. This margins evaluation will be performed consistent with the SSES categorization as a 0.3 g focused-scope plant in accordance with table 3.1 of Supplement 4. For the study of internal fires, we plan on performing a PRA type analysis similar to that used in the IPE for internal events. At this time, we do not intend to use the COMPBRN code, but will use the fire initiation/propagation data available as part of the NUMARC/EPRI "FIVE" methodology for impact vector/equipment dependency development. To resolve concerns about high winds, external floods, and transportation/nearby facility accidents, PP&L will use the screening approach (vs. 1975 SRP criteria) also described in Supplement 4 to the generic letter and NUREG 1407. We plan to take advantage of similarity between Units 1 and 2. Initially, detailed walkdowns will be performed on one unit only. If design reviews/lessons learned from the first unit so justify, walkdowns of the second unit will be performed. It is expected that our submittal will conform, in general, to the standard table of contents presented in Appendix C of NUREG-1407. If deviations from this standard are needed to adequately convey the results of our study, a cross reference from the final report to the standard table will be provided.

Schedule

PP&L will begin work on the IPEEE in early 1992. As in the IPE for internal events, we will rely to the maximum extent feasible on internal expertise/analysis. A milestone schedule is in place; detailed scheduling will be completed in early 1992. Although we expect the details in these schedules to change over the life of the project, PP&L will submit our IPEEE results by June 27, 1994.

We request that you review the approach outlined in this submittal for conducting the Susquehanna IPEEE and notify PP&L if it is acceptable.

Very truly yours,

H. W. Keiser

cc: NRC Document Control Desk (original)
NRC Region I
Mr. G. S. Barber, NRC Sr. Resident Inspector
Mr. J. S. Raleigh, NRC Project Manager