



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

August 5, 1992

Docket No. 50-255

Mr. Gerald B. Slade
Plant General Manager
Palisades Plant
Consumers Power Company
27780 Blue Star Memorial Highway
Covert, Michigan 49043

Dear Mr. Slade:

**SUBJECT: PALISADES PLANT - REVIEW OF RESPONSE TO GENERIC LETTER 88-20,
SUPPLEMENT NO. 4 - INDIVIDUAL PLANT EXAMINATIONS FOR EXTERNAL EVENTS
(TAC NO. M83653)**

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, (three 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, 1991, submitted in response to Generic Letter 88-20, Supplement 4. We find that your selected IPEEE methods are acceptable. However, your submittal did not provide projected milestones and schedules. The reason given in your submittal for not providing this information was that the staff had not issued the Supplemental Safety Evaluation Report (SSER) approving the USI A-46 Generic Implementation Procedure (GIP). This SSER was issued by the staff on May 22, 1992, via Supplement 1 to Generic Letter 87-02. Therefore, we request that you update your IPEEE plans and provide your projected milestones and schedules to the NRC no later than September 18, 1992. The basis for that response date is that 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.

If your IPEEE submittal date is not consistent with the NRC's requested date of June 1994, you should forward your justification with sufficient discussion to provide the NRC staff with a basis for determining the acceptability of your schedules. However, we request that your IPEEE submittal be provided no later than mid-1995. 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.

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Mr. G. B. Slade

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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 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 within the requested time frame.

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,



Armando Masciantonio, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

Mr. Gerald B. Slade
Consumers Power Company

Palisades Plant

cc:

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Sincerely,

Original signed by:

Armando Masciantonio, Project Manager
Project Directorate III-1
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

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