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June 8, 1981



United States Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Darrell G. Eisenhut, Director
Division of Licensing

Subject: Systematic Evaluation Program - Integrated Assessment

Dear Mr. Eisenhut:

We have received a copy of your May 15, 1981 memorandum to H. R. Denton in which you outline the approach NRC intends to follow relative to the integrated plant safety assessment for the Systematic Evaluation Program (SEP). It was our understanding that the intent had always been for the SEP owners group together with NRC staff to develop a consistent methodology for conducting the integrated assessment based on the best available information at the time.

Subsequent discussions with NRC staff indicate that such a dialogue is not planned nor is a formal solicitation of comments on NRC's approach to the integrated assessment being contemplated. We feel this action is unwise for the following reasons:

1. The integrated assessment program is precedent setting for all future operating plant reviews. Denying an opportunity for comment and possible improvement in your process is not consistent with past regulatory practice on items of significance.
2. The NRC is now formulating a policy on safety goals which could be incorporated in the integrated assessment on a trial basis. It would be a shame to miss such a natural opportunity to test safety goal principles now being formulated.
3. The integrated assessment program outlined in your memo does not establish a criteria for judging whether the discrepancy is worth consideration in terms of a design modification. Although you have attempted to assign weighting factors to components in the decision process, there is no "bottom line" criterion established on what is acceptable either overall or individually, nor is there a rationale for determination of safety significance.

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We are quite sure that the SEP process can provide a "proving ground" for improvements in the regulatory process for all operating plants. This would be an ideal opportunity to establish a consistent, stable regime of criteria which reflect what is happening today in terms of risk assessment, safety goal concepts, and comparisons of costs vs. societal benefit. In this spirit we offer the following unsolicited comments to your Integrated Assessment process.

- o Integration of the SEP Topics with Generic and Other Issues is Difficult

Generic issues are big issues removed from SEP by the NRC. These on-going multi-plant issues are driven on different schedules at different levels of pressure (e.g. Commission order with regard to equipment qualification, regulation with respect to fire protection). Without NRC senior management support, integration of topics of this nature will be cursory at best, if possible at all.

NRC Management, in all branches must not undermine the integration process by blocking the incorporation of all plant modifications in a coherent fashion. In particular, the Appendix R alternate shutdown system, equipment qualification and seismic analyses all could be dealt with logically, at once, in the integrated assessment if NRC Management would support the philosophy of the SEP concept.

- o This assessment process seems to overstep the initial intent of the Systematic Evaluation Program.

Originally SEP was intended as a measurement of the "delta" between new plants and old plants. It is now developing into the writing of a compendium of fixes that must be installed on the involved plants as a semi-formal licensing action. If it were to be restored to its original function (documentation of the differences between current detailed criteria and existing facilities) the benefit to be derived by involvement of licensee representatives on the evaluation team could be realized.

- o Safety significance should not be determined by judgement alone.

Probabilistic risk assessments of individual plants, if available, should be incorporated into the initial determination of significance. Even without a plant specific analysis, there are generic findings which can guide judgement.

- o Ranking of individual topics on the basis of a point system, rigidly applied, will not produce valid findings.

Although some selection method must be used to conclude relative significance between items, the wooden application of an arbitrary point system will produce meaningless results. Unless the safety significance of each item is determined in the context of the specific plant under consideration and the specifics of its own site, a valid judgement cannot be achieved. A ranking system may be a slight aid in this process but it certainly cannot be the principal vehicle for selection of items.

- o The Probabilistic Risk Assessment Branch should be involved in topic review.

Some of the insights that have been gained recently by NRC in performing Risk Assessment could enable elimination of some low priority items immediately and reduce staff workload in development of the integrated assessment.

- o Review by management should not be a "One Shot" at the end.

A management review board should be established and periodic review of the assessments while they are in progress should be performed.

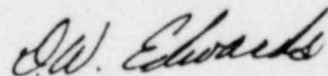
- o The final phase of SEP is missing.

At the conclusion of SEP a determination was to be made as to whether or not this was a worthwhile program. The following items should be incorporated as a minimum:

- Evaluate the worth of this approach in terms of results. For example: Are the findings conclusive or elusive? Is another approach less manpower intensive? Is the result worth the long time to complete the effort required? Was integrated assessment possible and meaningful? Has the current licensing process improved as a result of this effort?
- Plants that have completed SEP should be treated as ordinary plants in the future. Although it is clear that old plants are not the same as the very newest plants and should not be compared with new plant criteria, the final result of SEP will be the finding that these plants do not present an unusual risk. The normalcy of these plants should be overtly recognized.
- There needs to be a more objective, quantified measurement tool employed to carry on any future assessments if a follow-on to SEP is contemplated.

We appreciate your time and consideration in this matter and would be pleased to discuss our comments further, at you convenience.

Sincerely,



D. W. Edwards, Director
Operational Projects

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cc: S.E.P. O.G. Members
D. Schaffstall (KMC)