



**SCE&G**

MEMBER

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October 10, 1990  
815.14

Mr. John T. Chen  
Office of Nuclear Regulatory Research  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Chen:

SUBJECT: VIRGIL C. SUMMER NUCLEAR STATION  
DOCKET NO. 50/395, OPERATING LICENSE NO. NPF-12  
COMMENTS ON THE DRAFT SUPPLEMENT 4 TO GENERIC LETTER 88-20 AND  
NUREG-1407

South Carolina Electric & Gas Company (SCE&G) has reviewed draft Supplement 4 to Generic Letter (GL) 88-20 and draft NUREG-1407 which concern performance of an Individual Plant Examination of External Events (IPEEE). In addition, SCE&G attended the NRC Workshop held September 11-13, 1990, and participated with NUMARC in the development of industry comments for these documents. SCE&G believes that the overall cost of conducting the IPEEE will be significantly greater than NRC estimates. Notwithstanding the anticipated cost for this effort (estimated to be in excess of two million dollars per plant by the industry), this IPEEE request for information will be extremely burdensome on the SCE&G Staff. The specialized resources required to perform the IPEEE (e.g., seismic and fire protection experts) are either very limited or not available at all.

In view of the substantial cost and resources involved, it is SCE&G's position that a backfit analysis under 10CFR50.109 should be conducted prior to proceeding with the GL supplement. SCE&G believes that the IPEEE is best handled under 10CFR50.109 because it requires reviews against new criteria and backfits could be expected to follow. Also, it has not been demonstrated that the IPEEE will provide significant benefits in terms of plant safety. SCE&G does not believe that the provisions in 10CFR50.54 (f) covering NRC requests for information were intended to allow such an extensive and costly type of request as the IPEEE.

Should the NRC ultimately require utilities to perform an IPEEE, SCE&G provides the following specific comments on the IPEEE documents. Please note that SCE&G also endorses the comments developed by NUMARC on this subject.

1. SCE&G recommends NRC re-evaluation of the scope of the GL request and the timeframe allowed for completion of the IPEEE. Resolution of acceptable alternatives for conducting various external event evaluations must also be completed. SCE&G has already dedicated significant resources to conducting the IPE. Therefore, the IPEEE schedules must allow time for assessing the alternatives for evaluating the events. If this is not done, contractor support will be increased which will significantly add to the cost of the effort. The additional

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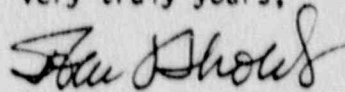
contractor support will also defeat one of the original purposes of the Severe Accident Policy, which is to promote a better understanding of severe accident behavior by the utility staff.

SCE&G recommends that the scope and accepted alternatives available to address the IPEEE be agreed upon between NRC and the industry (i.e., NUMARC) prior to issuance of the GL. Preferably GL 88-20 Supplement 4 would allow completion of the IPE work prior to initiation of the IPEEE.

2. The NUMARC/EPRI Fire Vulnerability Evaluation (FIVE) Methodology should be reviewed and approved by NRC as an alternative for internal fire assessment prior to issuance of GL 88-20, Supplement 4.
3. The lessons learned from past seismic Probabilistic Risk Assessment (PRA) studies and Seismic Margin Assessment (SMA) studies should be used to provide a simplified walk-down method for use by the majority of plants to address the IPEEE seismic evaluation (in lieu of the more costly PRA or SMA approaches). Such an approach could dramatically reduce the overall costs and burden on utility staffs for the IPEEE effort, while ensuring that potential enhancements are identified.
4. The 60 day response period for submitting a proposed program for completing the IPEEE is not acceptable, especially with an indeterminate NRC Staff position on use of the FIVE methodology and the extent of seismic evaluation required. The existing options will take considerable effort to evaluate prior to a decision on the best approach for a given utility. In addition, contractual arrangements must be outlined before final commitments to the NRC are made. SCE&G concurs with the NUMARC recommendation for a one year response period after issuance of the GL supplement or 60 days prior to initiation of the IPEEE.

If you have any questions concerning these comments, please contact Mr. Bob Whorton at (803) 345-4725.

Very truly yours,



John L. Skolds

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