



Jim Conran

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11/25/91

NUCLEAR MANAGEMENT AND RESOURCES COUNCIL

1776 Eye Street, N.W. • Suite 300 • Washington, DC 20006-2496
(202) 872-1280

William H. Rosin
Vice President & Director
Technical Division

November 20, 1991

Dr. Thomas E. Murley, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Mail Stop 12 G 18
Washington, D.C. 20555

Dear Dr. Murley:

As you are aware, NUMARC has had extensive interactions with NRC staff concerning the identification and implementation of an appropriate Individual Plant Examination of External Events (IPEEE) for severe accident vulnerabilities. In order to avoid duplication of effort and to maximize the efficient utilization of limited licensee resources, it has been a priority objective of the industry to have effective coordination of USI A-46 and IPEEE seismic activities. This is consistent with NRC staff philosophy as set forth in the Committee to Review Generic Requirements (CRGR) comments provided as Enclosure 2 to the Minutes of CRGR Meeting No. 183, April 5, 1990, where they stated: "The staff should give special attention to the schedule prescribed for the A-46 and IPEEE walkdowns; these related tasks should be carefully coordinated, and enough flexibility allowed in scheduling by licensees, to avoid duplication of effort and unnecessary waste of resources." This philosophy was formally expressed in Generic Letter 88-20, Supplement 4, which recommends that "USI A-46 should be coordinated with the IPEEE so that the objectives of both activities may be accomplished with a single walkdown effort."

The generic letter supplement requests licensees to submit, by December 26, 1991, a letter which describes their proposed programs for completing the IPEEEs, including milestones and schedules. Recent communications with NRC staff indicate that the Supplemental Safety Evaluation Report (SSER) on the Seismic Qualification Utility Group (SQUG) Generic Implementation Procedure (GIP) for resolution of USI A-46 is not expected to be issued until mid-December or beyond. Even with no further delay in issuance of the SSER, we believe that insufficient time is available for licensees to review the SSER prior to the IPEEE response date. We further believe that review of the SSER is necessary to the final planning and effective coordination of A-46 and IPEEE activities and is necessary for finalization of seismic walkdown training to be used by both A-46 and non A-46 utility personnel. As such, NUMARC is recommending that all of its utility members affected by the GIP SSER consider excluding from their 180-day response letter any specific schedular commitments related to seismic IPEEE activities. Instead, we have recommended that such information be included as part of a supplemental response to be provided after issuance of the SSER on the SQUG GIP.

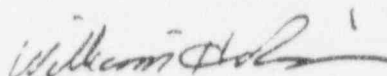
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We are hopeful that the SSER for the GIP will be issued in the near future, with closure of all open issues, to allow licensees to complete their planning, scheduling and conducting of A-46 and IPEEE activities in a coordinated and effective manner.

Sincerely,



William H. Rasin

JCB/skg

cc: J. E. Richardson, NRR
W. T. Russell, NRR
J. G. Partlow, NRR