

## UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555

June 17, 1992

Docket No. 50-382

Mr. Ross P. Barkhurst Vice President Operations Entergy Operations, Inc. Post Office Box B Killona, Louisiana 70066

Dear Mr. Barkhurst:

SUBJECT: REVIEW OF RESPONSE TO GENERIC LETTER 88-20, SUPPLEMENT NO. 4 - INDIVIDUAL PLANT EXAMINATIONS FOR EXTERNAL EVENTS - WATERFORD STEAM ELECTRIC STATION, UNIT NO. 3 (TAC NO. M83692)

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 p'ant examination of external events (IPEES). Guidance was provided with the generic letter supplement in the form of NUREG-1407, "Procedural and Submittal Guidance for the Individu. 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 (3 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 the Entergy Operations, Inc. 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 US1 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.

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If your submittal sch dule is not consistent with the NRC's requested date of June 1994, you should conward 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 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.

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.

Sincerely.

## ORIGINAL SIGNED BY

David L. Wigginton, Senior Project Manager Project Directorate IV-1 Division of Reactor Projects - III/IV/V Office of Nuclear Reactor Regulation

cc: See next page

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Mr. Ross P. Barkhurst - 2 -June 17, 1992 If your submittal schedule is not consistent with the NRC's requested date of June 1994, you should forward your justification with sufficient discussion to provide the staff with a basis for determining the acceptability of your schedules were, we request that your submittal be provided no later than mid-1995. Ging 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. 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. Sincerely, David L. Wigginton, Senior Project Manager Project Directorate IV-1

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