

UNITED STATES NUCLEAR REGULATORY COMMISSION WASHINGTON D. C. 20555 July 29, 1992

Mr. Thomas M. Parker, Manager Nuclear Support Services Northern States Power Company 414 Nicollet Mall Minneapolis, Minnesota 55401

Dear Mr. Parker:

SUBJECT: PRAIRIE ISLAND - REVIEW OF RESPONSE TO GENERIC LETTER NO. 88-20.

SUPPLEMENT NO. 4, INDIVIDUAL "LANT EXAMINATIONS FOR EXTERNAL EVENTS

(TAC NOS. M83663 AND M83664)

Supplement 4 to Generic Letter 88-20, issued on June 28, 1991, requires each licensee and each Construction Permit holder to conduct an individual plant examination of external events (IPEEE). Guidance was provided with a supplement to the generic letter 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 180day 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 sub tted 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 27, 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 schedule is not acceptable. The proposed submittal date of March 1. 1997, is significantly beyond the NRC's requested submittal date of June 1994 and will impact the NRC's schedule for the closure of severe accident issues. We, therefore, request that you reassess your schedule and report the results no later than September 18. 1992. This date is based on the fact that plants covered under USI A-46 are required to respond by September 18, 1992, with their USI A-46 program and you have linked the IPEEE response to USI A-46.

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 IPEE significantly sooner than your projected submittal date. Therefore, the staff requests that you reassess your opportunities for submitting your IPEEE results on a more expeditious schedule, preferably

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cc:

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Kris Sanda, Commissioner Director of Public Service 790 American Center Bu' ding 150 East Kellogg Boulevard St. Paul, Minnesota 55101 Mr. Thomas M. Parker - 2 - July 29, 1992

either in 1994 or early 1995 but no later than June 1995. Also, 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 is so by June 1995 was established.

Please inf. was of any changes in either the schedule or methodology.

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,

Original signed by

William O. Long, Project Manager Project Directorate III-1 Division of Reactor Projects, III/IV/V Office of Nuclear Reactor Regulation

cc: See next page

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