



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

July 10, 1992

Docket No. 50-482

Mr. Bart D. Withers
President and Chief Executive Officer
Wolf Creek Nuclear Operating Corporation
Post Office Box 411
Burlington, Kansas 66839

Dear Mr. Withers:

SUBJECT: WOLF CREEK GENERATING STATION - REVIEW OF RESPONSE TO GENERIC
LETTER 88-20, SUPPLEMENT NO. 4 - INDIVIDUAL PLANT EXAMINATIONS
FOR EXTERNAL EVENTS - (TAC NO. M83696)

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 plant examination of external events (IPEEE). Guidance was provided with the generic letter supplement in the form of NURCG-1407, "Procedural and Submittal Guidance for the Individual 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 your letter dated December 24, 1991, submitted in response to Generic Letter 88-20, Supplement 4. We find that your selected IPEEE methods are acceptable. However, your proposed submittal date 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 the staff issued the Supplemental Safety Evaluation Report (SSER) approving the USI A-46 Generic Implementation Procedure (GIP) on May 22, 1992 (Supplement 1 to Generic Letter 87-02). 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.

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 significantly sooner than your projected submittal date. Therefore, the staff requests that you

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reassess your opportunities for submitting your IPEEE results on a more expeditious schedule, preferably 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 issues by June 1995 was established.

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 D. Reckley, Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

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