



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20545

July 14 1992

Docket Nos. 50-265
and 50-301

Mr. Robert E. Link, Vice President
Nuclear Power Department
Wisconsin Electric Power Company
231 West Michigan Street, Room P379
Milwaukee, Wisconsin 53201

Dear Mr. Link:

SUBJECT: REVIEW OF RESPONSE TO GENERIC LETTER NO. 88-20, SUPPLEMENT NO. 4 -
INDIVIDUAL PLANT EXAMINATIONS FOR EXTERNAL EVENTS - POINT BEACH UNIT
NOS. 1 AND 2 (TAC NOS. M83661 AND M83662)

Supplement 4 to Generic Letter 88-20 was issued on June 28, 1991, to request 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 NUREG-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 20, 1991, submitted in response to Generic Letter 88-20, Supplement 4. You proposed alternate methods to satisfy the IPEEE requirements for your plant instead of the methods described in Supplement 4 and in NUREG-1407. As indicated in your submittal dated December 20, 1991, you intend to use only the EPRI curve for the seismic IPEEE. This may be acceptable if you can demonstrate that the Electric Power Research Institute (EPRI) curve at your site is higher than the Lawrence Livermore National Laboratory (LLNL) curve. Our discussion on the preference of using both the LLNL and EPRI curves in seismic Probabilistic Risk Analysis (PRA) can be found in Appendix D to NUREG-1407 and in a recent NRC letter from James E. Richardson of NRC to Raymond Ng of NUMARC on the use of both seismic hazard curves, dated March 16, 1992. The rationale is that, based on the available information to date, we are unable to dispute the merit of either curve and consider both of them to be credible. Therefore, we prefer that both curves be used in the application of seismic PRA approach. The reporting criteria, such as $10E-6$ /year core damage frequency as specified in the Generic Letter 88-20 Supplement 4 were designed with the intent of helping a licensee determine which potentially important functional sequences and functional

9207230209 920714
PDR ADDCK 05000266
P PDR

NRC FILE CENTER COPY

Fol 110

Mr. Robert E. Link

- 2 -

July 14, 1992

failures should be reported to the NRC in the IPEEE submittal. It is emphasized that these criteria do not represent a threshold for vulnerability. Please update your IPEEE plans to incorporate the provisions of GL 88-20, Supplement 4 and forward them to the NRC within 60 days of the date of this correspondence. If you desire to propose a new approach (i.e., an approach not specifically considered in NUREG-1407), you should provide sufficient supporting documentation to allow NRC to determine whether the proposed approach is acceptable. If your submittal schedule is not consistent with the NRC's requested date of June 1994, please provide justification for your delay. However, your submittal date should not extend beyond June 1995.

Sincerely,

Original signed by

Robert B. Samworth, Project Manager
Project Directorate III-3
Division of Reactor Projects - III/V/V
Office of Nuclear Reactor Regulation

cc: See next page

DISTRIBUTION

Docket File
PDIII-3 Reading File
JZwolinski
PKreutzer
OGC, 15B18
PDIII-3 Plant File
CAder, NLS324
RHernan, 14C7

NRC & Local PDRs
BBoger
JHannon
BSamworth
ACRS (10), P315
EGreenman, R111
JChen, NLS324

OFC	PDIII-3/LA	PDIII-3/PM	PDIII-3/V
NAME	PKreutzer	BSamworth:lh	JHannon
DATE	7/15/92	7/13/92	7/14/92

OFFICIAL RECORD COPY

DOCUMENT NAME: PBIPEEE.LTR

Mr. Robert E. Link
Wisconsin Electric Power Company

Point Beach Nuclear Plant
Unit Nos. 1 and 2

cc:

Ernest L. Blake, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, N.W.
Washington, DC 20037

Mr. Gregory J. Maxfield, Manager
Point Beach Nuclear Plant
Wisconsin Electric Power Company
6610 Nuclear Road
Two Rivers, Wisconsin 54241

Town Chairman
Town of Two Creeks
Route 3
Two Rivers, Wisconsin 54241

Chairman
Public Service Commission
of Wisconsin
Hills Farms State Office Building
Madison, Wisconsin 53702

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
Office of Executive Director
for Operations
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
6612 Nuclear Road
Two Rivers, Wisconsin 54241