



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

September 4, 1992

Docket No. 50-302

Mr. Percy M. Beard, Jr.
Senior Vice President,
Nuclear Operations
Florida Power Corporation
ATTN: Manager, Nuclear Operations
Licensing
P.O. Box 219-NA-2I
Crystal River, Florida 32629

Dear Mr. Beard:

SUBJECT: CRYSTAL RIVER UNIT 3 - REVIEW OF RESPONSE TO GENERIC LETTER
NO. 88-20, SUPPLEMENT NO. 4 - INDIVIDUAL PLANT EXAMINATIONS
FOR EXTERNAL EVENTS (TAC NO. M83612)

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 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 19, 1991, submitted in response to Generic Letter 88-20, Supplement 4. You proposed alternate methods to satisfy some of the IPEEE requirements for your plant as compared to the methods described in Supplement 4 and in NUREG-1407. For some of the external events discussed in NUREG-1407, your stated approach is that the plant meets existing licensing requirements and, therefore, no further evaluations are planned in these areas. The purpose of the IPEEE is to systematically look beyond the design basis for potential improvements that could help prevent or mitigate severe accidents. We, therefore, find that your response and approach fall short of providing the information requested by Generic Letter 88-20, Supplement 4.

Your intention to submit a fire PRA by June 30, 1994, is acceptable to the staff.

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Your December 19, 1991, letter implies that actions to resolve USI A-46 will be sufficient to address the seismic aspects of the IPEEE and, because the plant was designed in accordance with NRC regulations, you plan no further analyses or submittals on those issues. You are encouraged to combine USI A-46 and IPEEE seismic walkdowns. The staff's approval of the Generic Implementation Procedure was issued on May 22, 1992. However, the information we are requesting for the seismic IPEEE program goes beyond the USI A-46 program. NUREG-1407 states that either a seismic probabilistic risk analysis (PRA) or a seismic margin methodology (SMM) is acceptable for responding to the IPEEE request. Most licensees have opted for the SMM approach. The staff recognizes that Crystal River is classified as a "reduced-scope" plant in regard to using the SMM approach. Therefore, the scope of work to perform an SMM evaluation is much less than that required for most other plants. The information developed during the USI A-46 program will likely provide the bulk of that needed for the SMM evaluation. You would logically expand your USI A-46 walkdown effort to cover those system and equipment needed for the IPEEE but not needed for USI A-46. For more detailed discussions related to the seismic IPEEE, please refer to NUREG-1407 (Sections 3.2.4 and 6.3.3.3, and Appendix 3).

The staff provided a progressive screening approach in Chapter 5 of NUREG-1407 to evaluate risk due to high winds, floods, and transportation and nearby facility accidents (HFOS). Part of the screening process determines whether the plant design would meet the 1975 Standard Review Plan criteria. Your response stated that, for various reasons, Florida Power Corporation does not plan to perform IPEEE analyses in these areas. We request that your June 1994 IPEEE response address these hazards as detailed in NUREG-1407, Chapter 5 and in the format specified in NUREG-1407, Appendix C.

Please revise your initial response to Generic Letter 88-20, Supplement 4 on a schedule consistent with the date that your response to Generic Letter 87-02, Supplement 1 (USI A-46 implementation) is due. Your revised response should specifically discuss the project milestones, schedules, and methods selected for the seismic and HFOS IPEEEs. 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.

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

Mr. Percy M. Beard

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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 B. C. Buckley for
Harley Silver, Acting Director
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Division of Reactor Projects - I/II
Office of Nuclear Reactor Regulation

cc: See next page

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Crystal River Unit No.3
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