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SUBJECT: Responds to Generic Ltr 88-02, "ISAP II."

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 TITLE: OR Licensing Submittal: Integrated Safety Assessment Program (ISAPII)

NOTES: Application for permit renewal filed. 05000400

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Carolina Power & Light Company

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United States Nuclear Regulatory Commission
ATTENTION: Document Control Desk
Washington, DC 20555

H. B. ROBINSON STEAM ELECTRIC PLANT, UNIT NO. 2
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BRUNSWICK STEAM ELECTRIC PLANT, UNIT NOS. 1 AND 2
DOCKET NOS. 50-325 & 50-324/LICENSE NOS. DPR-71 & DPR-62

RESPONSE TO GENERIC LETTER 88-02: INTEGRATED SAFETY ASSESSMENT
PROGRAM II (ISAP II)

Gentlemen:

On January 29, 1988 we received Generic Letter 88-02, Integrated Safety Assessment Program II (ISAP II), dated January 20, 1988, which broadly describes the program and solicits utility comments. Specifically, the letter requests whether licensees are at least interested in eventually participating. We contacted your staff on February 17, 1988 to request an extension of the due date until February 29, 1988. Your staff verbally granted the extension.

In general, we are in favor of continuing to explore the possibilities of a program as outlined in the generic letter, but are skeptical about the requirement for a license amendment as the only method of participation. We encourage the Commission to make the ISAP II consistent with the proposed "Policy Statement on Integrated Schedules," dated November 27, 1987 (52FR 45 344), which permits three levels of participation.

In addition, we are reluctant about probabilistic risk assessment (PRA) programs because in the past, our PRA based solutions have not been in general, accepted by the staff.

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Attached is our response to the questionnaire. The response is applicable to all three of our plants: Brunswick Steam Electric Plant, H. B. Robinson Nuclear Plant, and Shearon Harris Nuclear Power Plant. If you have any questions, please contact Pedro Salas at (919) 836-8015.

Yours very truly,



L. I. Loflin
Manager

Nuclear Licensing Section

LIL/PS/mss (5380PSA)

Attachment

cc: Mr. B. C. Buckley
Mr. R. Lo
Dr. J. Nelson Grace
Mr. G. F. Maxwell
Mr. W. H. Ruland
Mr. E. Sylvester
Mr. L. Garner

RESPONSE TO GENERIC LETTER 88-02,
INTEGRATED SAFETY ASSESSMENT PROGRAM (ISAP) II

1. Question: Would you be interested in participating in ISAP II? If so, in what time frame?

Response: In general, we believe that the program has merit with respect to addressing both NRC and utility initiatives from a common perspective. We remain undecided, however, as to whether participation in the program, as outlined in the generic letter, would be beneficial. Our primary concern is the need for a license amendment.

2. Question: Do you believe that an industry/NRC seminar consisting of a brief discussion by NRC followed by a question and answer period would be beneficial prior to making a decision?

Response: Yes.

3. Question: Would you be interested in a one-on-one meeting with the NRC to discuss your particular facility or facilities?

Response: Yes.

4. Question: If you remain undecided regarding participation, what additional information do you need in order to make a decision?

Response: See "concerns" in # 5.

5. Question: Do you have any potential concerns about participating in ISAP II?

Response: The ISAP II program outlined in Generic Letter 88-02 appears to have several conflicts with the NRC's "Proposed Policy Statement on Integrated Schedules" recently issued for comment.

- ISAP II seems to focus on safety significance alone as the method of prioritization. The Policy Statement recognizes "a process for prioritizing and scheduling the individual actions, taking into account factors such as safety, plant availability, radiation exposure, procurement requirements, and costs." Further, "the Commission has concluded that the selection of the prioritization methodology should be decided by the licensee."
- ISAP II delineates arbitrary completion dates for the various rankings of safety significance, contrary to the philosophy of scheduling all items according to relative priority and resource availability. Again, safety significance is only one aspect of priority.
- The requirement of a license amendment as the only method of participation is contrary to the Policy Statement approach of recognizing at least three levels of participation.

- The inference of including any schedule dates in the license amendment is disturbing, and contrary to the stated philosophy that schedule changes may occur due to new utility or NRC issues, changes in regulations, procurement problems, etc. To have to utilize a license amendment to change a schedule is unreasonable.

6. Question: Do you have any suggestions for program improvements or changes?

Response: Integrate the ISAP II program with the Integrated Scheduling program.