



NUCLEAR ENERGY INSTITUTE

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Dr. Joseph Murphy, Acting Director  
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Office of Nuclear Reactor Research  
U.S. Nuclear Regulatory Commission  
Washington, DC 20555-0001

**SUBJECT:** Industry Comments on NRC Workshop and Draft Contractor Report on Seismic Revisit of the Individual Plant Examination of External Events (IPEEE)

- REF:** (1) NUREG-1488, "Revised Livermore Seismic Hazard Estimates for 69 Nuclear Power Plant Sites East of the Rocky Mountains," dated October 1993.
- (2) NEI Letter to NRC (Dr. Ashok Thadani), discussing an NEI white paper, "Justification for Reduction in IPEEE Program Based on Revised LLNL Seismic Hazard Results," dated April 5, 1994.
- (3) NRC Information Notice 94-32, "Revised Seismic Hazard Estimates," dated April 29, 1994.
- (4) Contractor Report ERI/NRC 94-502, "A Proposed Approach to Seismic Scope Re-Assessment for Individual Plant Examination of External Events (IPEEE)," Final Draft, dated September 1994.
- (5) Contractor Report ERI/NRC 94-504, "Approaches for Proposed Modifications of Seismic IPEEE Guidelines for Focused-Scope Plants," Final Draft, dated September 1994.
- (6) Official Transcript of Proceedings, NRC Workshop in Seismic IPEEE Revisit, held October 21, 1994, NRC Offices - White Flint, Maryland.

Dear Dr. Murphy:

The purpose of this letter is to provide comments on the contractor reports and views of the NRC expert panel that were presented at the subject workshop. Additionally, and probably more importantly, given that most licensee and NRC staff efforts should be focused on performing and reviewing the seismic IPEEE submittals, respectively, this letter includes industry suggestions that we believe provide a more productive approach toward accomplishing the intent of the original IPEEE generic letter.

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## BACKGROUND

NUREG-1488 (Reference (1)) was issued earlier this year and provided revised LLNL seismic hazard curves which showed a significant reduction in seismic hazards at all plants. In light of this new information, the industry developed a White Paper (Reference (2)) which provided justification for plants to consider reductions in the scope of their seismic IPEEE effort. Partially in response to this industry position, the NRC issued Information Notice 94-32 (Reference (3)) stating its intent to solicit a contractor review of the issue and potential rebinning. That effort resulted in two final draft reports (Reference (4) and (5)) being issued in early October 1994.

The NRC staff subsequently held a public workshop to discuss the results of the seismic IPEEE revisit and to solicit questions and comments. During the workshop, comments were presented (Reference (6)) by the NRC contractor and their expert review panel, as well as by NEI, utility representatives and the public. The NRC staff indicated that a four week period would be available to submit formal comments, after which they would develop a position based on all of the comments and recommendations.

The NRC workshop discussions and review of the consultant reports have not led to any major modifications in the industry perspective. Nevertheless, the NRC staff should recognize that the goal of industry is to commit to the level of effort which through experience has proven to be of benefit in finding plant vulnerabilities which can be cost-effectively modified for safety enhancement.

Prudent management of utility resources and expenditures dictates that licensees not allocate expenditures on evaluations which have proven to be of little to no value. As several utility representatives attested at the public workshop, incremental savings of \$100,000 to \$250,000 per unit due to a change in scope from focused- to reduced-scope are significant sums in today's operating environment.

## RECOMMENDATIONS

Subsequent to the NRC workshop, through the collective efforts of EPRI and its contractor as well as selected NEI member utilities, we compiled specific comments on the draft ERI/NRC reports, reassessed the previous industry positions and recommendations, and developed a list of recommendations.

Enclosure 1 provides a summary of industry's comments on the contractor reports. This is not an exhaustive listing, but rather is intended to indicate the added complexity and confusion we believe these reports bring to the entire process. Creation of a "modified focused-scope" bin is not useful.

Enclosure 2 contains our recommendation to licensees that are considering, or have committed to, reduction in the scope of their seismic IPEEE as a result of the latest knowledge available regarding hazard levels and risk insights. And finally, Enclosure 3 provides a discussion on the selection of an absolute value for a risk threshold, in order to place in context the values discussed in the NEI white paper and NRC contractor reports.

Our recommendation, that essentially all focused-scope plants perform reduced-scope seismic reviews, is based on the seismic IPEEE lessons learned discussions held at the workshop, insights gained by licensees during IPEEE and A-46 walkdowns, and analytical efforts that have taken place so far. It is further supported by the hazard-based and risk-based analyses that were presented in the NEI white paper and reinforced in Enclosure 3.

Rather than expending NRC and industry resources establishing another "bin" with the associated implementing guidance, a more constructive approach is to highlight the discussions and insights brought forth at the NRC workshop. If shared with a broader audience of licensees, NRC staff and other interested parties, these insights could lead to more productive and timely seismic risk assessments.

As we suggested at the workshop, NEI is willing to explore joint sponsorship with the NRC of a "Seismic IPEEE Lessons Learned" workshop in the first quarter of 1995. We would envision that workshop to be the vehicle to allow seismic experts, NRC staff and licensees to communicate directly with one another regarding the most important aspects of the seismic walkdown as well as identify those analytical aspects of the focused-scope request which have not proven cost-beneficial.

Finally, if left unchanged, the statement in (Reference (3)) that licensees should "submit a request to adjust their IPEEE schedule to take the new information into account," is likely to delay rather than maintain IPEEE schedules. Due to the tempering nature of that statement, we urge the NRC staff, either in an administrative letter or information notice, to summarize the insights provided by the expert panel and attendees at the NRC IPEEE workshop, and to encourage performance of the walkdowns as soon as possible.

## CONCLUSION

With respect to the IPEEE, licensees should put forth that level of effort which will prudently and cost-effectively enhance plant safety. We continue to support our position in our earlier letter (Reference (2)) and commentary (Reference (6)) that it is the responsibility of each licensee to propose the most cost-effective program to satisfy the seismic IPEEE request consistent with the level of seismic hazard at the specific site. This includes revising any IPEEE commitment.

The "modified focused-scope" bin and accompanying guidance are not helpful and will probably not be used by industry. Consequently, the interactions among industry, the

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public and NRC staff that would inevitably result should the NRC staff attempt to resolve/issue the draft reports (Reference (4) and (5)) and pursue another supplement to Generic Letter 88-20 on plant binning, are an inappropriate use of resources. Such an approach will only delay the ultimate utility assessments and IPEEE submittals, and with no gain.

We believe the industry and public are better served if the licensees proceed with the most effective portion of the seismic IPEEE: the walkdown. The collective efforts of industry and the NRC staff need to be focused on doing the things that are prudent, while setting aside controversies on binning of plants and analytical tasks which have proven to be an impediment in reaching resolution.

We appreciate the opportunity to provide these comments. Please direct any questions to either Mehdi Sarram or myself.

Sincerely,



David J. Modeen

DJM/  
Enclosures

c: Dr. Ashok Thadani, NRC  
Dr. John Chen, NRC