

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8903220095 · DOC. DATE: 89/03/17 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME AUTHOR AFFILIATION
 SORESEN, G.J. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Comments on draft NUREG-1335, "Individual Plant Exam:
 Submittal Guidance."

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 5
 TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES		RECIPIENT ID CODE/NAME	COPIES	
		LTTR	ENCL		LTTR	ENCL
	PD5 LA	1	0	PD5 PD	2	2
	SAMWORTH, R	1	1			
INTERNAL:	ACRS	6	6	ARM/DAF/LFMB	1	0
	NRR/DEST/ADS 7E	1	1	NRR/DEST/CEB 8H	1	1
	NRR/DEST/ESB 8D	1	1	NRR/DEST/MTB 9H	1	1
	NRR/DEST/RSB 8E	1	1	NRR/DEST/SICB	1	1
	NRR/DOEA/TSB 11	1	1	NUDOCS-ABSTRACT	1	1
	OGC/HDS2	1	0	<u>REG FILE</u> 01	1	1
	RES/DSIR/EIB	1	1			
EXTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			

Add: A50D / DSP / TPAB Ltr 1 Encl 1
 NRR / PMAS / PMSB 1 1
 RES / DSIR / EIB 1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL 22

R
I
D
S
/
A
D
D
S

mlh 4/89

21

1

1

1

1

1

1

1

1

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

March 17, 1989

8903220095 890317
PDR ADOCK 05000397
P FDC

D

50-397

U. S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Dear Sir:

Subject: NUREG-1335 "INDIVIDUAL PLANT EXAMINATION:
SUBMITTAL GUIDANCE" DRAFT REPORT FOR COMMENT

The Supply System has completed its review of the subject draft NUREG document. During the course of this review, the Supply System had the benefit of attending the NRC sponsored workshop in Fort Worth, Texas from February 28 - March 2, 1989. Comments resulting from our review are enclosed for your use.

The Supply System is entering the IPE process cautiously as we develop a stronger background of knowledge and experience in PRA techniques. We are making strong efforts to acquire the necessary expertise to produce a credible and useful analysis of our plant, both through hiring of new personnel and training of our existing staff. Additionally, we have retained the services of a contractor who is skilled in these matters. Still, our enclosed comments reflect our perspective to date in this field and our concern about the apparent lack of clear guidance or acceptance criteria available from the NRC regarding this process.

Given our concerns about the IPE process as it was presented at the workshop in Fort Worth, we do feel encouraged that the NRC is now taking steps in the direction of closing severe accident issues. It is our hope that NRC management will be able to maintain control over this very complicated and interactive process. The NRC responses to industry comments heard in the workshop certainly indicate that the intent is there.

Add: AEDD/ASP/TPAB
NRR/PMA/PMAB
RES/DSIR/EIB

4r Encl

Aool
1/2

U. S. Nuclear Regulatory Commission

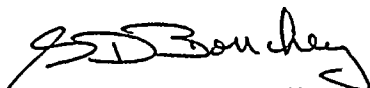
Page 2

March 17, 1989

NUREG-1335 "INDIVIDUAL PLANT EXAMINATION:
SUBMITTAL GUIDANCE" DRAFT REPORT FOR COMMENT

Thank you very much for this opportunity to participate in the NRC's regulatory development process. Should you have any questions or desire further information, please do not hesitate to contact me.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

AJM/tlr

Enclosure

cc: Mr. D. L. Williams, BPA
Mr. R. Wayne Houston, NRC
Mr. J. A. Raulston, IPE Partnership

COMMENTS ON NUREG-1335

1. The interaction between the NRC inspection and enforcement function and the IPE, Containment Performance Improvement Program and the Severe Accident Management and Research programs needs to be better defined and documented. At the recent NRC sponsored workshop in Fort Worth, Texas, NRC management personnel stated that the IPE is clearly a "beyond the design basis" type of analysis and as such the equipment credited for operation during severe accident sequences need not meet the requirements of 10 CFR 50.49 "Environmental Qualification of Equipment Important to Safety". The NRC and the Industry are embarked upon a fairly long range program, and the introduction of new personnel into this process as time passes must be anticipated. Without clear and unambiguous documentation of NRC criteria in this area, utilities could well face increased scrutiny for failure to include the last ditch, severe accident sequence equipment in their Equipment Qualification programs. Since many sequences which are analyzed are terminated by crediting operation of non-safety related equipment, the introduction of Equipment Qualification requirements would cast a shadow over the entire process.
2. Generic Letter 88-20 in Appendix 2 provides sequence selection criteria and requires a report in accordance with 10 CFR 50.54(f) from utilities of important functional sequences and functional failures that might lead to core damage or unusually poor containment performance. The relationship of this report to those required by regulation, for example 10 CFR 50.73 "Licensee Event Report System" needs to be established. Would a utility making a 10 CFR 50.54(f) report in accordance with the Generic Letter 88-20 screening criteria also be required to report in accordance with 10 CFR 50.73 ? If yes, would it be acceptable to file a single report and thus reduce the paperwork burden on the licensees? Are there any other reporting requirements imposed by the regulations which might be duplicative of the Generic Letter?
3. Appendix 3 of Generic Letter 88-20 discusses accident management programs and lists as suggested elements Organization, Instrumentation and Equipment and, Procedures and Training. Based upon the presentations given at the recent NRC sponsored workshop in Fort Worth regarding the IPE and ancillary programs, the Supply System is concerned that the NRC may not fully appreciate the implications of some of these suggestions, particularly those regarding utility management training. While it is clear that the level of detail to which this program has been developed by the staff does not allow a full assessment, we believe that further NRC activities along these lines should be based on realistic and practical needs. The Supply System believes that existing BWR accident management programs, such as that which we are currently implementing, effectively fulfill most of the program elements discussed in the generic letter.

Instrumentation and Equipment may need review to confirm adequacy for the credited severe accident function. However, we feel that our procedures and training will prove to be adequate given our existing accident management organization and any procedural upgrades identified through the IPE.

COMMENTS ON NUREG-1335

Again, we recognize that the NRC staff is yet in the early stages of developing their proposals for severe accident management programs. Our concern is that careful attention be paid to and proper credit given for existing programs. We believe that new developments along these lines should be evolutionary and not revolutionary.

4. The NRC is embarking upon several programs which appear to have originated from the Severe Accident Policy Statement. These include the Mark 1 containment recommendations, the Containment Performance Improvement program, the Severe Accident Management and Severe Accident Research programs and the IPE program. Each of these programs has its own schedule which is different from the others. Additionally, each appears to be managed by separate groups within the NRC. The potential for conflicting requirements arising from this arrangement would appear to be high unless NRC management takes a strong hand in coordinating and integrating the disparate elements into a cohesive body. This is a comment which was made during the NRC sponsored workshop in Fort Worth, but is none-the-less worth repeating here.

5. Section 2.1.2.4 of NUREG-1335 requests a concise description of plant documentation used and a concise discussion of the process used to confirm that these documents represent the as-built, as-operated plant.

The Supply System interpretation of this section is that it is not a request for new design reverification efforts on the part of licensees.

6. Section 2.5 of NUREG-1335 and Generic Letter 88-20 indicate that examination of external events will proceed separately and on a different schedule from that of internal events. We would note that our comment number 4 above applies in this case as well.
7. Presentations by the NRC staff at the IPE workshop in Fort Worth indicate that the staff intends to act as a "clearing house" for information to ensure that utilities are apprised of significant findings by other utilities with similar plants and to investigate why a particular IPE has not uncovered vulnerabilities found for other plants of the same type.

We are concerned that this approach could potentially lead to pressure on individual utilities to implement plant specific backfits simply because a similar approach may have been taken at a similar plant. The Supply System urges NRC management to examine this proposal and ensure that the method used to disseminate information of this nature conforms to existing controls on plant specific and generic backfitting. It is our suggestion that generic findings, such as the list of actions for severe accident management, be issued for information only. Generic findings should not become of part of the NRC inspection and audit recommendations and guidance.

The purpose of performing individual plant specific analyses is to identify those vulnerabilities specific to a given plant. Requiring industry wide plant specific evaluations of generic findings without careful consideration will significantly add to the already high resource demands of the IPE program and thereby decrease the effectiveness of the plant specific evaluations.

8. All NRC man-hour and cost estimates for completion of an IPE should be carefully scrutinized. Discussions at the work shop in Fort Worth reveal them to be seriously flawed and unrealistically low for even a minimum effort. Publication of such flawed estimates seriously inhibits the ability of utilities to obtain adequate funding and resources to perform a satisfactory IPE. Wherever possible, consideration should be given to deletion of these estimates from the published documents by the NRC.
9. The absence of a definitive safety goal in the IPE process prevents the accomplishment of a very basic purpose of the Commission's Severe Accident Policy. This purpose is "To achieve improved stability and predictability of reactor regulation in a manner that would merit improved public confidence in (our) regulatory decision making." The Supply System is concerned that the achievement of stability and predictability must await the further development of NRC standards for acceptability. Plant specific core damage frequencies developed in the IPE process will not be comparable without in-depth evaluation of the individual methodologies, assumptions, computer software, data and possible reanalyses. Yet the NRC staff will set about making determinations of acceptable risk lacking any real underlying framework of guidance.

This framework should not only include a standard for judgment of the acceptability of each plants' IPE but must be based upon some standard for what the industry and society believes is an acceptable level of risk. In the absence of this standard and basis the Supply System is not sure that improved stability and predictability in the regulatory process will result. Without these elements, it is unclear how public confidence can be improved.

