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SUBJECT: Comments on proposed Generic Ltr 88-20, Suppl 4, "Individual Plant Exam of External Events for Severe Accident...."

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Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Gentlemen:

Subject: COMMENTS ON PROPOSED GENERIC LETTER 88-20, SUPPLEMENT 4, INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS (IPEEE) FOR SEVERE ACCIDENT VULNERABILITIES

The Supply System welcomes this opportunity to comment on the proposed Supplement 4 to Generic Letter 88-20 and proposed NUREG-1407.

The proposed supplement is divided into three distinct areas. The Staff acknowledges that the section dealing with high winds, floods, and transportation and nearby facility accidents is generally already met by those plants licensed to the 1975 Standard Review Plan (SRP). Therefore, this section of the supplement could reasonably be separated out as a separate supplement and issued only to those Licensees not licensed to the 1975 SRP criteria. This would result in both a reduction in burden on both the Licensees and the Staff by reducing the number of submittals required to be reviewed in this area.

The proposed supplement is slated to be issued in accordance with the requirements of 10CFR50.54(f) with the response made under oath or affirmation. Additionally, the Supply System embraces its obligation to submit all information to the Staff in as complete and accurate a form as possible as codified under 10CFR 50.9. Therefore, the Supply System recommends that the request for "a concise description of the walkdown team" used in both the seismic and fire areas, and "a description of the internal review or peer review performed, the results of the review team's evaluation, and a list of the review teams members" be eliminated. It is the responsibility of the Licensee to ensure the accuracy and completeness of information submitted, and is a responsibility that should be left to the Licensee for development and implementation. Since the conclusions of the program satisfy the Severe Accident Policy Statement, this additional information would appear to be details not required for Staff review.

The Supply System concurs with the Staff that the ultimate benefit to be gained from the performance of the IPEEE is in the knowledge gained by Utility personnel in its performance. We appreciate the recognition by the Staff that limited

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Licensee resources already strained by performance of the IPE could impact the schedule for the IPEEE, and that schedule extensions will be considered where there will be significant participation by Licensee personnel in the IPEEE process. The 60 day initial response period, however, may not allow adequate time for a thorough review of the available options for those Licensees such as the Supply System who have undertaken performance of the IPE in-house. Therefore, the Supply System recommends that the initial submittal period be extended to 180 days. It is expected that this additional up front time will not impact the ultimate completion date of the requested review for the Supply System. The additional review time could, however, result in the Supply System having a better understanding of the available options and resources required.

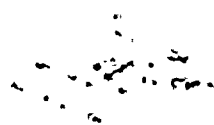
The information requested in the proposed supplement involves the review of conditions beyond the licensing basis for WNP-2. The Supply System concurs with the Nuclear Utility Backfitting and Reform Group (NUBARG) position that a regulatory analysis be performed to support the issuance of this proposed supplement. In addition, since this supplement is divided into three distinct requested actions (seismic, fire, and other), and since each of these actions requires a separate expenditure of Licensee resources with directly related potential benefits, the Supply System recommends that each of the three actions have a separate regulatory analysis and that only the requested actions that are supported by a successful analysis be included in this or additional supplements.

A preliminary estimate for the cost of the proposed review shows the 6 person-years estimate by the Staff is quite optimistic. This estimate does not seem to take into account the original goal of performing as much of the work in-house as practical. This will involve substantial training and development work on the part of the Supply System staff to ensure that the review is accurate and complete and that the knowledge gained from the experience can be beneficial in the future. The Supply System requests that this estimate be reviewed with the above activities in mind.

Very truly yours,


G. C. Sorensen, Manager
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cc: JB Martin - NRC RV
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