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SUBJECT: Forwards IPE of external events response to NRC audit *Reports*
 concerns & RAI.

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February 15, 1995

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U. S. Nuclear Regulatory Commission
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Gentlemen:

Donald C. Cook Nuclear Plant Units 1 and 2
INDIVIDUAL PLANT EXAMINATION OF EXTERNAL EVENTS
RESPONSE TO NRC AUDIT CONCERNS AND REQUEST
FOR ADDITIONAL INFORMATION

In an audit of the individual plant examination for external events by the NRC staff on July 26 to 28, 1994, the NRC identified several concerns with the methods used to perform the fire and seismic portions of the analysis. Draft revisions to these analyses were developed and presented to the NRC staff during a meeting on October 25, 1994. At that time, the staff felt that many of the original concerns were substantially addressed; however, some follow up information was requested in a letter dated November 14, 1994.

This letter provides the completed fire and seismic probabilistic risk assessment analyses. Attachment 1 summarizes the NRC concerns and questions on these analyses, with a brief summary of how each concern or question is addressed in the analyses. Attachment 2 is the revised fire probabilistic risk assessment, and Attachment 3 is an addendum to the seismic probabilistic risk assessment. Attachment 4 contains supporting seismic fragility calculations requested by the NRC in the November 14, 1994, letter.

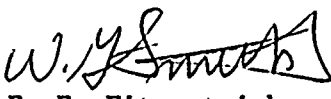
The fire probabilistic risk assessment revision resulted in a change in core damage frequency from $1.61\text{E-}07/\text{yr}$ to $3.76\text{E-}06/\text{yr}$. This represents an increase in the fire risk magnitude relative to total core damage frequency from 0.2% to 6.0%. This increase is due to the reevaluation of items such as the fire initiation frequency and the impact of initiating events on each of the fire zones analyzed. Even though there was an increase in core damage frequency, no new vulnerabilities were identified as a result of the revised fire probabilistic risk assessment.

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The revised seismic probabilistic risk assessment estimates the total core damage frequency as $3.17\text{E-}06/\text{yr}$, an 80% reduction from the original analysis value of $1.83\text{E-}05/\text{yr}$. This is primarily due to the conservatism that was removed from the seismic fragility calculations and the subdivision of the second and third seismic intervals. Although both of these changes were requested by the NRC in order to identify vulnerabilities that might have been hidden by the conservative analyses, no new, significant contributors or re-ranking were identified in the revised analysis.

Sincerely,

for 
E. E. Fitzpatrick
Vice President

eh

Attachments

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