

# New Hampshire Yankee

NYN-90180

October 3, 1990

United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Attention: Document Control Desk

References: Facility Operating License No. NPF-86, Docket No. 50-443

Subject: Comments on Draft Generic Letter 88-20, Supplement 4 and Draft  
NUREG-1407

Gentlemen:

New Hampshire Yankee (NHY) has reviewed the draft guidance for the Individual Plant Examination (IPE)/External Events (EE), as well as preliminary industry comments provided to the NRC by NUMARC. We agree with the NUMARC comments, and provide more specific suggestions with regard to the seismic portion of the IPE/EE.

New Hampshire Yankee recognizes that an important function of the IPE and IPE/EE is the identification of cost-effective plant improvements. We also believe in PRA as a valuable tool for gaining insight into the operation of our plant. New Hampshire Yankee has already performed an external events PRA (fire, seismic, and other events) as part of our full-scope Level III PRA for all operating modes. We will enhance the existing PRA as part of our on-going probabilistic safety assessment program, and will use the enhanced PRA to address seismic IPE/EE issues.

New Hampshire Yankee requests that the NRC recognize our use of PRA for performing the seismic portion of the IPE/EE, in both NUREG-1407 and GL 88-20, Supplement 4, prior to final issuance.

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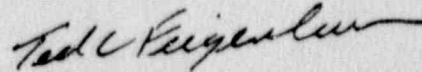
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Should you have any questions regarding these comments, please contact Mr. James Peschel at (603) 474-9521, extension 3772.

Very truly yours,



Ted C. Feigenbaum  
President and  
Chief Executive Officer

TCF/GK:dma/ssl

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