

June 3, 1983

TO ALL OPERATING REACTOR LICENSEES, APPLICANTS FOR AN OPERATING LICENSE AND HOLDERS OF CONSTRUCTION PERMITS FOR WESTINGHOUSE PRESSURIZED WATER REACTORS

Gentlemen:

**SUBJECT: SAFETY EVALUATION OF "EMERGENCY RESPONSE GUIDELINES"
(GENERIC LETTER 83-22)**

The NRC staff has reviewed the proposed Westinghouse Emergency Response Guideline (ERG) Program as described in Westinghouse Owners Group (WOG) letters of November 30, 1981, July 21, 1982 and January 4, 1983, and in the material accompanying those letters. We have concluded that the guidelines are acceptable for implementation and will provide improved guidance for emergency operating procedure development. We suggest that implementation of the guidelines proceed in three steps:

- (1) Preparation of plant specific procedures which, in general, conform to the Emergency Response Guidelines referenced above and implementation of these procedures as required by Generic Letter 82-33, dated December 17, 1982;
- (2) Preparation of supplements to the guidelines which cover changes, new equipment, or new knowledge and incorporation of these supplements into the procedures; and
- (3) Completion and improvement of the guidelines to meet our long term requirements, followed by incorporation of improvements into plant specific procedures.

The prompt implementation of Step 1 will allow the benefits of the significant improvements you have achieved to be realized soon. We note however, that the guidelines are written for the procedure writers, not control room operators, and therefore preparation and implementation of procedures will require additional Human Factors input. Step 2 refers to a program for guideline or procedure updates which will be generated as a matter of routine after the implementation. This essentially is a maintenance function. Step 3 refers to a program for addressing those aspects of the guidelines and procedures where additional long term work may be needed, either in your emergency procedure program or as part of abnormal procedure updates.

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June 3, 1983

We have identified in the Safety Evaluation Report (SER) a number of items associated with the guidelines which need further work by the Westinghouse Owners. We require that these items be addressed by either incorporating them into a future guideline revision or otherwise justifying the disposition of the item. Additionally, because the Emergency Procedure Guidelines must be dynamic in that changes must be made to reflect changes in equipment or new knowledge, we expect the Westinghouse Owners' Group or a similar coalition of utilities and vendors to accept responsibility for continued maintenance of the guidelines. Therefore, we have requested in the enclosed letter that the Westinghouse Owners' Group provide a plan for addressing the SER items and a description of the program for steps 2 and 3 above.

As discussed in the enclosed SER, the staff reviewed each step of individual guidelines to determine if the expected results would be obtained, if sufficient alternatives were provided for equipment failure, and if the set of instructions would bring the plant to a safe shutdown condition. The staff also compared the ERGs with the Item I.C.1 requirements of NUREG-0737. The staff concluded that (1) a sufficient portion of the final ERG package has been completed so that implementation of the ERGs into plant procedures can begin, (2) the ERGs meet the most significant requirements of NUREG-0737, and (3) overall plant safety will be improved by prompt implementation since the ERGs provide a significant improvement over existing plant procedures. The staff has also concluded that the guidelines can be translated into emergency operating procedures, that they are sufficiently function-oriented, and that acceptable procedures can be developed based on the guidelines using the guidance of NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures." We therefore find the guidelines acceptable for implementation.

Sincerely,

Original signed by
 Darrell G. Eisenhut

Darrell G. Eisenhut, Director
 Division of Licensing

- Enclosures: *See Jacket*
 1. Letter to Mr. Sheppard,
 dated
 2. SER on Guidelines

*Please see previous concurrence page.

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Sincerely,

Darrell G. Eisenhut, Director
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