

FEB 8 1983

TO: All Boiling Water Reactor Licensees of Operating Reactors (Except LaCrosse), Applicants for an Operating License and Holders of Construction Permits (Generic Letter 83-05)

SUBJECT: SAFETY EVALUATION OF "EMERGENCY PROCEDURE GUIDELINES, REVISION 2," NEDO-24934, JUNE 1982

Gentlemen:

The NRC staff has reviewed the General Electric Topical Report NEDO-24934, "Emergency Procedure Guidelines, Revision 2," June 1982, including the errata dated September 28, 1982 and has found the Emergency Procedure Guidelines to be acceptable for implementation. We believe that the BWR Emergency Procedure Guidelines provide a basis for a significant improvement over current emergency operating procedures. Although the guidelines are not complete (combustible gas control and secondary containment control guidelines are not yet included) and the enclosed Safety Evaluation Report requires a few changes to the guidelines, we find the guidelines with the NRC proposed changes to be acceptable. We suggest that implementation of the guidelines proceed in two steps:

- (1) Preparation of plant specific procedures which in general conform to the Emergency Procedure Guidelines referenced above and implementation of these procedures as outlined in Supplement 1 to NUREG-0737, transmitted by Generic Letter No. 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 plant specific procedures.

Step (1) refers to the Guidelines referenced above and discussed in the enclosed SER. Step (2) refers to Guideline updates which will be generated as a matter of routine after the plant specific procedures have been put in place. Although Step (2) includes combustible gas control and secondary containment control guidelines which are yet to be developed, it is essentially a maintenance function.

During our review, we identified several steps in the guidelines which require minor changes. These are identified in the enclosed SER. We ask that you address these items during the implementation of Step (1). We also note 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.

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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 BWR 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 BWR Owners Group provide a description of the program for future changes or supplements to the guidelines.

As discussed in the enclosed SER, we find the actions specified in the Emergency Procedure Guidelines to be generally correct and appropriate and within the operator's capability. The combination of all emergency actions into two guidelines and seven contingencies greatly simplifies the emergency instructions. In addition, the use of symptoms rather than events as bases for actions, eliminates errors resulting from incorrect diagnosis of events, and addresses multiple failures and operator errors. We therefore find the guidelines acceptable for implementation.

Sincerely,

Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing

See jacket

Enclosure: SER on Guidelines
Letter to Mr. Dente, dated
February 4, 1983

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