



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
 WASHINGTON, D. C. 20555

February 4, 1983

Mr. Tom Dente, Chairman
 BWR Owners Group
 c/o Northeast Utilities Service Company
 Post Office Box 270
 Hartford, Connecticut 06101

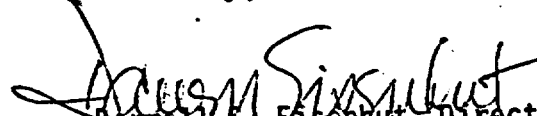
Dear Mr. Dente:

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

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 Safety Evaluation Report requires a few changes to the guidelines, we find the guidelines with the NRC proposed changes to be acceptable. We are preparing a generic letter to be sent to the General Electric licensees and applicants that will provide them with the Safety Evaluation Report. Our thoughts on the implementation program are given in Enclosure 1.

As discussed in the Safety Evaluation Report (Enclosure 2), 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,


 Darrell G. Eisenhut, Director
 Division of Licensing

Enclosures:

1. Implementation Program
2. SER on Guidelines

cc w/enclosures:
 General Electric

IMPLEMENTATION PROGRAM

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 General 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.

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 request that you describe your program for future changes or supplements to the guidelines. We expect future changes to result from:

- (1) Generic items such as STWS Rulemaking, Inadequate Core Cooling Instrumentation and ongoing Unresolved Safety Issues,
- (2) Completion of guidelines for combustible gas control and secondary containment control, and
- (3) Operating Experience.