



UNITED STATES
 NUCLEAR REGULATORY COMMISSION
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February 4, 1983

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 File - 003*

Mr. R. W. Wells
 Chairman, CE Owners Group
 Box 270
 Hartford, CT 06141-0270

Dear Mr. Wells

This letter provides preliminary acceptance of the CE Owners' Group (CEOG) Emergency Procedure Guidelines for implementation in plant specific emergency procedures and outlines our requirements for additional work in this area. The staff has identified technical and administrative issues which require timely resolution. We also require a program to manage future changes as the need is identified.

Our review to date has been primarily based on draft submittals of the CEOG Emergency Procedure Guidelines supplemented with extensive contact between the staff and CEOG representatives. The current review relied on the following sources of information:

- (1) The draft report "Combustion Engineering Emergency Procedure Guidelines," CEN-152 Revision 01, August, 1982
- (2) Response to our questions titled "Resolutions to Procedures and Test Review Branch Questions and Comments on C-E Emergency Procedure Guidelines, June 29, 1982" (no date)
- (3) Response to our questions titled "Resolutions to Warren C. Lyon's Questions and Comments on C-E Emergency Procedure Guidelines, June 23, 24, 29" (no date)
- (4) Results from Meetings between C-E (and in some cases with C-E Owner's Group representatives) and NRC between 1979 and 1982.

Our review has progressed to the point where we conclude that implementation of the guidelines should provide a greater assurance of operational safety than presently exists. The CE owners should proceed with plant-specific implementation. We anticipate issuing an SER subsequent to our review of your formal submittal of CEN-152, "Combustion Engineering Emergency Procedure Guidelines" dated November 22, 1982. We anticipate that our SER will find CEN-152 acceptable. Both this conclusion and our conclusion that you should begin implementation of Emergency Procedure Guidelines into plant specific procedures are based on the judgment that no further major

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problems in the proposed guidelines are expected. Our conclusions are further based upon the assumption that the results from the NRC/CE Owners meetings are reflected in your CEN-152 submittal. The enclosure presents our thoughts on the implementation phase.

Sincerely,


Darrell G. Eisenhut, Director
Division of Licensing

Enclosure:
Implementation Program

cc: w/enclosure
CE Licensees
CE Applicants
CE
J. Barrow, CE Owners Group
G. Bishoff, CE
V. Callahan, CE
R. Pearce, CE

IMPLEMENTATION PROGRAM

We suggest that the implementation program contain three elements:

- (1) Preparation of plant specific procedures based on the Emergency Procedure Guidelines referenced above and implementation of these procedures.
- (2) A program for the preparation of supplements to the generic guidelines or plant specific guidelines which cover changes, new equipment, or new knowledge and incorporation of these supplements into the procedures.
- (3) Completion of and improvements to the Emergency Procedure Guidelines (EPG) or plant specific procedures in the longer term.

The prompt implementation of Step 1 will allow the benefits of the significant improvements you have achieved to be realized soon.

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 a part of abnormal procedure updates. A listing and discussion of identified issues will be provided in the staff SER. It is anticipated that one or more of these areas will be resolved under TMI action item I.C.9.

- A. Generic items, ATWS rulemaking, SPDS designs, RCS vent installations, and ICC instrumentation. Unresolved Safety Issues may also enter this list.
- B. Technical items such as the following:
 - a. EPG coverage extension into electrical power supply availability so that plant behavior under such events as station blackout is covered.
 - b. Management of accidents such as multiple ruptured steam generator tubes from the viewpoint of radioactivity release and a more complete procedure for SGTR.
 - c. Containment coverage.
 - d. Additional consideration for condensate management, such as the coverage of alternate sources of water.

- C. Potential behavior under conditions where physical phenomena may differ from those discussed in the EPG needs evaluation and coverage. Typical are the following:
 - a. Hydraulic instabilities which may introduce unusual instrument readings which could mislead an operator to take an unwarranted action.
 - b. Degraded core conditions and guidance for operator response under these conditions.
- D. Several items are plant specific; but general guidance is applicable. These include:
 - a. Differences between plants with and without PORVs and differences in PORV sizing and possible instruction perturbations.
 - b. The influence of sensor location, such as positioning of hot leg temperature determination devices, and feedback into operator instructions.

We request that you describe your program for Items (2) and (3), above, of the implementation program.