

July 29, 1983

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

Gentlemen:

SUBJECT: SAFETY EVALUATION OF "EMERGENCY PROCEDURE GUIDELINES"
(GENERIC LETTER 83-23)

The NRC staff has reviewed the proposed Combustion Engineering Emergency Procedure Guideline (EPG) Program as described in Combustion Engineering Owners Group (CEOG) letters of November 22, 1982 and March 29, 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 as discussed in Generic Letter 83-09. We suggest that implementation of the guidelines proceed in three steps:

- (1) Preparation of plant specific procedures which, in general, conform to the Emergency Procedure 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 in your emergency procedure program.

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July 29, 1983

We have identified in the Safety Evaluation Report (SER) a number of items associated with the guidelines which need further work by the Combustion Engineering 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 Combustion Engineering 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 Combustion Engineering Owners' Group provide a plan for addressing the SER items and by letter dated February 4, 1983, we requested a description of the program for steps 2 and 3 above.

As discussed in the enclosed SER, the staff finds that the EPGs represent a significant improvement over the guidance provided in current emergency operating procedures. The approach of dividing the EPGs into a treatment of recognized "simple" conditions using Optimum Recovery Guidelines (ORGs) and coverage of all other conditions using Functional Recovery Guidelines (FRGs) meets the requirements for a symptom oriented emergency response. The guidelines provide sufficient guidance such that they can be translated into acceptable emergency operating procedures using the process identified in NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures." The staff therefore concludes that although efforts to improve the EPGs should continue, the EPGs identified in CEN-152 Revision 1 will provide a greater assurance of operational safety and are acceptable for implementation.

Sincerely,
Original signed by
Darrell G. Eisenhut

Darrell G. Eisenhut, Director
Division of Licensing

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

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Generic Letter 83-23

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