



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

ENCLOSURE 1

September 19, 1983

Mr. Daniel D. Whitney, Chairman  
Operator Support Subcommittee  
Babcock & Wilcox Owners Group  
Rancho Seco Nuclear Station  
14440 Twin Cities Road  
Herald, California 95638

Dear Mr. Whitney:

SUBJECT: SAFETY EVALUATION OF "ABNORMAL TRANSIENT OPERATING GUIDELINES"

The NRC staff has reviewed your proposed Abnormal Transient Operating Guidelines (ATOG) as described in Warren J. Hall's letter of March 31, 1982, your letter of June 15, 1982, and D. Napior's letter from B&W to the Owners Group dated March 14, 1983, and as described in the material accompanying those letters. We have concluded that ATOG is acceptable as a basis for implementation of improved plant specific procedures and will provide improved guidance for operator emergency procedures over that which currently exists. We encourage timely implementation of ATOG and are available to work with you and the Owners' Group staff regarding any questions you may have on this Safety Evaluation Report. We are sending a generic letter to the B&W licensees and applicants that provides them with the Safety Evaluation Report. Our thoughts on the implementation program are given in Enclosure 1.

We have identified in the Safety Evaluation Report (Enclosure 2) a number of items associated with guidelines which need further work by the B&W Owners. We require that you address these items, either incorporating them in to a future guideline revision or otherwise justifying your disposition of the item. Your plan for addressing these items should be transmitted to us by no later than 90 days after the date of this letter.

Sincerely,

  
Darrell G. Eisenhut, Director  
Division of Licensing

Enclosures:  
As stated

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IMPLEMENTATION PROGRAM

The acceptance of ATOG as a basis is contingent upon the satisfactory completion of the following items:

- (1) Receipt of an acceptable supplement to ATOG which covers ATWS.
- (2) Receipt of a revision to ATOG Part II which includes operator guidance for managing RCS voids and interrupted natural circulation that may occur as a result of these voids. This coverage should include all power operation conditions (e.g., SBLOCA), as well as cooldown and depressurization. In particular, we require that the voiding phenomenon be extensively discussed in the technical background document and included in all operator training programs. It is also to include alternate plant behavior which the operator may encounter during cooldown.

We have received your submittal of July 2, 1983, addressing the above topics. This submittal is under review and will be addressed in a supplement to this SER.

- (3) Receipt of a comprehensive plan from the B&W Owners that address the items identified in this SER. This plan, which should include a schedule and a detailed description of the depth and breadth of the program, should be submitted within 90 days.
- (4) Agreement with you regarding your comprehensive plan no later than 30 days following NRC receipt of your plan.

The staff will report on the resolution of these items in an SER supplement. 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.

The staff recommends that the implementation of the guidelines proceed in 4 steps:

- (1) Interim extension of ATOG to better cover ATWS and certain aspects of natural circulation. This is to be completed before ATOG is used in the implementation of procedures process;
- (2) Preparation of plant specific procedures which, in general, conform to the ATOG referenced above and implementation of these procedures as required by Generic Letter 82-33, dated December 17, 1982;
- (3) Preparation of Supplements to the guidelines which cover changes, new equipment, or new knowledge and incorporation of these supplements into the procedures; and
- (4) Completion and improvement of the guidelines to meet our long term requirements, followed by incorporation of improvements into plant specific procedures.

The guidelines will need to be revised from time to time to incorporate experience within the industry, generic design changes, and new knowledge that could affect the safety of emergency operations. The B&W Owners Group letter of May 4, 1983, provides a satisfactory outline of a plan to provide a generic ATOG. We share your judgment that a B&W generic technical guideline will provide an effective mechanism for future guideline updates, changes and enhancements. Additionally, the staff requests that the Owners provide a description of their program for future maintenance of the guidelines and of their plans to keep the staff informed of changes to the guidelines. This description should include methods to be used for the validation and verification of future revisions to the guidelines and the means to be used to ensure configuration control of the guidelines. Additionally, changes in plant-specific procedures based on guidelines that have not been approved by the staff should be made in accordance with the provisions of 10 CFR 50.59. The licensees retain the responsibility for determining whether or not the changes would involve an unreviewed safety question. If they do, then they should not be implemented until staff approval is formally received in writing.