

NUCHAR REGULATORY COMMISSION -VASHINGTOR D.C. 20055

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Mr. Robert W. Jurgenson, Chariman Westinghouse Owners' Group American Electric Power Service Corporation 2 Broadway New York, New York 10004

Dear Mr. Jurgenson:

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By letter dated April 9, 1981 (OG-56) you proposed a schedule for the development and implementation of emergency procedures and training for station blackout. Eased on your proposal, generic guidelines would be submitted by September 1, 1981, for our review and approval, and implementation at operating reactors would occur by their first refueling outage after January 1, 1982. On this schedule, implementation of revised Emergency Operating Procedures and operator training could be as late as mid-1983. Based on our review of ALAB-603 we have determined that some action regarding station blackout should be taken as soon as possible. Therefore, we consider your proposed approach and schedule unacceptable.

In a presentation to the staff on June 18, 1981, the Westinghouse Owners' Group indicated that the "optimal recovery guidelines" (ORG) will be completed by October 20, 1981. We recommend that you complete the ORG for station blackout as soon as possible so that individual owners may use it in developing interim procedures and training for station blackout events.

Due to the short time remaining for implementation of interim station blackout procedures, submittal of the ORG for NRC review is not required prior to implementation. After September 1981, the Office of Inspection and Enforcement will verify that interim procedures, covering the issues described in Generic Letter 81-04, are in place. For the long term, this issue should be included in the development of the revised emergency operating procedure guidelines and the upgraded procedures that are being prepared in response to TMI Action Plan Item I.C.1, as clarified in NUREG-0737, Item I.C.1.

Sincerely,

✓ Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation