REGULATORY DOCKET FILE COPY AUG 2 5 1980

Docket No.: 50-389

Dear Dr. Uhrig:

Dr. Robert E. Uhrig Vice President of Nuclear and General Engineering Florida Power and Light Company P. O. Box 529100 Miami, Florida 33152

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SUBJECT: INTERIM ACTIONS NEEDED FOR PLANT OPERATION PENDING FINAL RESOLUTION OF ANTICIPATED TRANSIENTS WITH FAILURE TO SCRAM (ATWS) (COMBUSTION ENGINEERING PWR)

In December 1978 the Nuclear Regulatory Commission (NRC) staff issued Volume 3 of NUREG-0460 which describes the proposed type of plant modifications the staff believes are necessary to reduce the risk from anticipated transients with failure to scram (ATWS) to an acceptable level. The NRC's Regulatory Requirements Review Committee completed its review in January 1979, and concurred with the staff's approach described in Volume 3 of NUREG-0460, insofar as it applies to your plant. The staff has issued requests for the industry to supply generic analyses to confirm the ATWS mitigation capability described in Volume 3 of NUREG-0460. Subsequently, the staff plans to present its recommendations for rulemaking on ATWS to the Commission. The Commission would, by rulemaking, determine the required modifications to resolve ATWS concerns and the required schedule for the implementation of such modifications. Your plant would, of course, be subject to the Commission's decision in this matter.

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Based on considerations described in pages 42 through 45, Volume 3 of NUREG-0460, the staff generally concluded that plants with operating licenses can continue to operate without undue risk to the health and safety of the public during the estimated 2 to 5 year period needed to implement the necessary modifications.

However, the staff believes the following steps should be taken as a prudent course prior to the issuance of an operating license in order to further reduce the risk from ATWS events during the interim period before the required plant modifications as determined by the Commission are completed.

An emergency operating procedure should be developed for an ATWS event, 1. including consideration of scram indicators, rod position indicators, flux monitors, pressurizer level and pressure indicators, pressurizer relief valve and safety valve position indicators, coolant average temperature, containment temperature and pressure indicators, steam generator level, pressure and flow indicators, and any other alarms

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Dr. Robert E. Uhrig

annunciated in the control room including alarms not processed through the electrical portion of the reactor scram system. The emergency operating procedure should be sufficiently simplified and unambiguous to permit prompt ATWS recognition.

2. The emergency operating procedure should describe actions to be taken in the event of an ATWS including consideration of manually scramming the reactor by using the manual scram buttons, and prompt actuation of the auxiliary feedwater system. These actions must be taken immediately following the occurrence of the event. Actions should also include prompt initiation of boration by actuation of the high pressure safety injection system to bring the plant to a safe shutdown condition.

We require that you submit your ATWS emergency operating procedure by October 19, 1980, for our review. Our review may include a visit to your plant to determine the feasibility of implementing your proposed procedures through operator simulation of the steps. Our evaluation must conclude that an acceptable procedure and operator training are completed prior to the issuance of a full power operating license.

Sincerely, Original signed by Robert L. Tedesco

Robert L. Tedesco, Assistant Director for Licensing Division of Licensing

cc: See next page

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