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APR 14

Mr. S. T. Rogers  
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Dear Mr. Rogers:

By a letter dated June 30, 1980, Mr. R. H. Buchholz forwarded the GE Emergency Procedure Guidelines to D. G. Eisenhut. On August 7 and 8, 1980, we met with representatives of the GE Owners' Group, General Electric Company and Commonwealth Edison (LaSalle Nuclear Station) to discuss the Emergency Procedure Guidelines, Revision 0, June 30, 1980. Based on the results of that meeting and the review conducted to date by the staff, we find the Emergency Procedure Guidelines acceptable for trial implementation at the LaSalle, Zimmer, Shoreham, Fermi 2, Susquehanna, and Washington Nuclear Project 2 stations. This letter is sent to you as Chairman of the BWR Emergency Procedures Group on behalf of the participants.

During the course of implementation we may identify areas that require modification or further analysis and justification. Since we anticipate that changes will be necessary regarding detailed guidance, your training program should properly account for such future procedural revisions. We will inform you of these areas as our review proceeds.

We recognize that postulating multiple equipment failures and operator errors can lead to situations that place a plant outside the limits of its technical specifications. While we in no way encourage deliberate operation outside of technical specification limits, we agree that the guidance provided in the draft guidelines is necessary to encompass the range of contingencies required when multiple failures are postulated. Operator training in use of the new procedures developed from these guidelines must stress this point and will be reviewed during our plant-specific reviews.

In our review to date, we have identified several areas where additional information is required. These areas are identified in the enclosure to this letter. Please inform us by October 27, 1980, of your schedule for submitting this information.

Sincerely,

Original signed by  
Darrell G. Eisenhut

Darrell G. Eisenhut, Director  
Division of Licensing

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Enclosure:  
Request for Additional SEE PREVIOUS YELLOWS FOR OTHER CONCURRENCES AND DISTRIBUTION Information

OFFICE	DHFS:DIR	DL:DIR	DL:LB#1	DL:AD/L		
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DATE	10/1/80	10/7/80	10/1/80	10/9/80		



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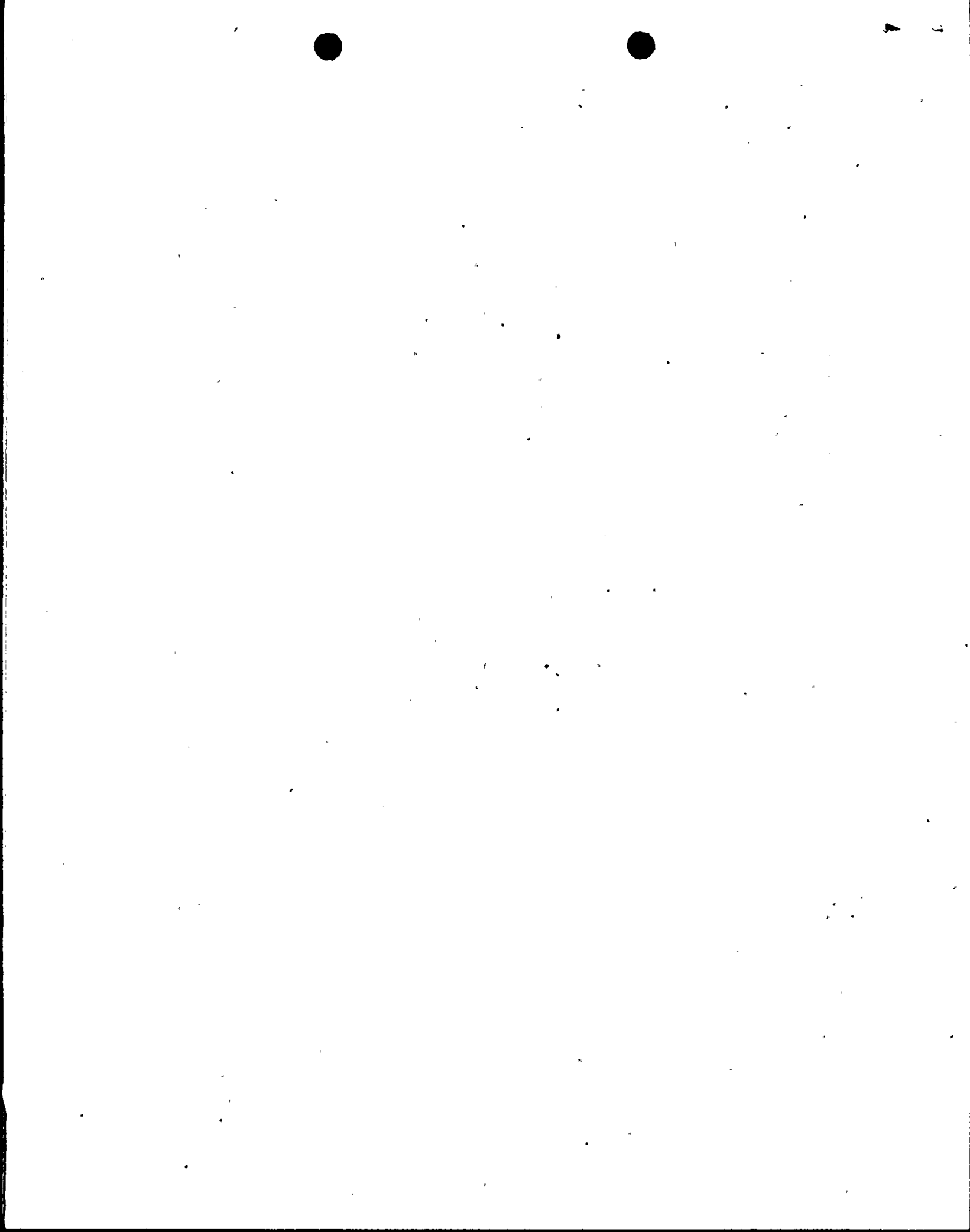


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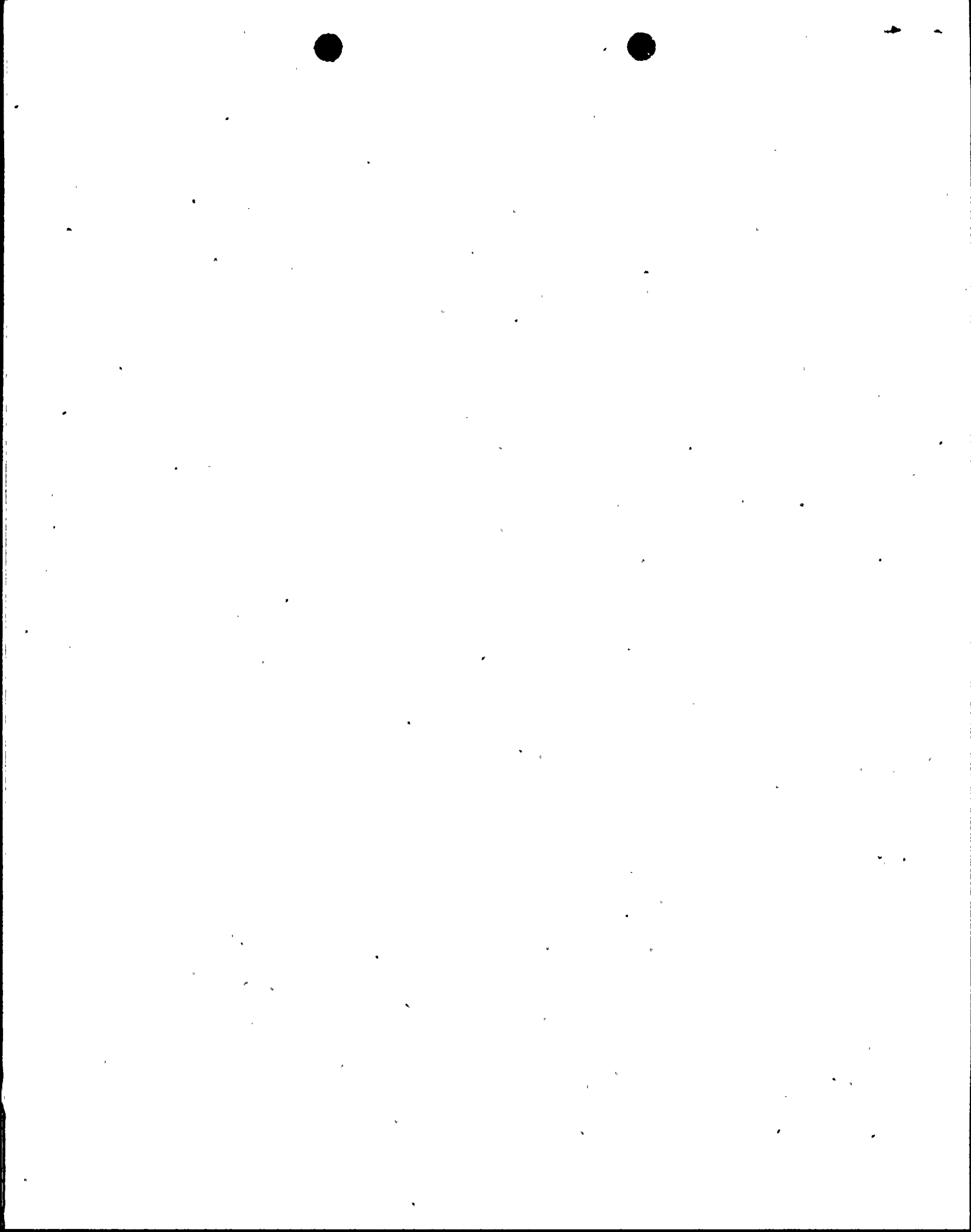
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REQUEST FOR ADDITIONAL INFORMATION  
EMERGENCY PROCEDURE GUIDELINES  
DRAFT 0, JUNE 30, 1980

1. The guidelines reference an Appendix A. We understand that Appendix A provides the methods of calculating the limits specified in the guidelines and the bases for those guideline steps for which the bases are not obvious. Please provide 5 copies of Appendix A to the guidelines.
2. Step C1-7.2 on page C1-4 calls for manual actuation of the ADS valves when the water level reaches the top of the active fuel. Analyses previously submitted have assumed earlier ADS actuation. Provide analyses to show that actuation when the water level reaches the top of the active fuel provides adequate core cooling.
3. Step C3-1 on page C3-1 calls for staged opening of SRV's for the case of core cooling without injection. Provide analyses to support the table given in step C3-1.
4. Cautions 4, 5, 13, 18 and step CC-2.4.2 require the operator to verify adequate core cooling. Describe the various means available to the operator for doing so. Where reliance is on observation that various systems are functioning, provide analyses to show that those systems are adequate.

