

December 5, 1984

Docket Nos. 50-250
and 50-251

Mr. J. W. Williams, Jr., Vice President
Nuclear Energy Department
Florida Power and Light Company
Post Office Box 14000
Juno Beach, Florida 33408

Distribution

<u>Docket file</u>	NRC PDR
ORB#1RDG	LPDR
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Dear Mr. Williams:

Reference: TAC Nos. 44345 and 44346

SUBJECT: SUPPLEMENT 1 TO NUREG 0737, ITEM I.C.1, PROCEDURES
GENERATION PACKAGE (PGP) FOR EMERGENCY OPERATING
PROCEDURES (EOPs)

By letter dated October 1, 1984, you submitted your PGP which provides guidance for developing plant specific EO. We are currently reviewing your submittal in accordance with the guidance provided in NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures." The PGP consists of four parts: 1) Plant-Specific Technical Guidelines, 2) Plant-Specific Writer's Guide, 3) Description of the Validation/Verification Program for EOPs and 4) Description of the Training Program for Upgraded EOPs.

We have enclosed a request for additional information (RAI). The RAI is necessary to continue our review of the plant-specific technical guidelines portion. We are also reviewing the remaining portions of the PGP and require no additional information relating to them at this time. We are being assisted in our review by Battelle Pacific Northwest Laboratories. We request your response to the enclosed RAI within 60 days from receipt of this letter in order to meet our current review schedule. We are available to discuss the enclosure and provide and clarification necessary.

The reporting and/or recordkeeping requirements of this letter affect fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

/s/DCFischer, acting for

Steven A. Varga, Chief
Operating Reactors Branch #1
Division of Licensing

Enclosure:
As stated

cc w/enclosure:

See next page

ORB#1:DL

DMcDonnell

12/04/84

C-ORB#1:DL

SVarga

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J. W. Williams, Jr.
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Turkey Point Plants
Units 3 and 4

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REQUEST FOR ADDITIONAL INFORMATION
TURKEY POINT, UNITS 3 AND 4
PROCEDURES GENERATION PACKAGE (PGP)

The staff is currently reviewing the Procedures Generation Package (PGP) for Turkey Point, Units 3 and 4 submitted by a letter dated October 1, 1984, from J. W. Williams, Jr., to D. G. Eisenhut. We have determined that additional information is needed to conduct a detailed review of the Plant-Specific Technical Guidelines portion of the PGP. The staff is currently conducting a detailed review of the three remaining portions of the PGP, the plant-specific writer's guide, the validation/verification program, and the training program. So that we may continue our review of the Plant-Specific Technical Guidelines, the following items are requested as a revision to the Turkey Point Units 3 and 4 PGP:

1. If the process used to write plant-specific technical guidelines from generic guidelines results in any deviations from or additions to the generic technical guidelines (because of different plant equipment, operating characteristics or design) the PGP should: 1) either identify all deviations and additions, or describe the evaluation performed to determine the safety significance of the deviations and identify all safety-significant deviations, and 2) provide the technical justification (i.e. engineering evaluation or analysis, as appropriate) for all deviations that are identified to the NRC.
2. Describe how the generic guidelines and background documentation were used to identify characteristics of needed instrumentation (e.g. set points; speed of response; units) and controls (e.g. discrete vs. continuous controls; response requirements, frequency of use):
 - a. If this information is not available from the generic technical guidelines and background documentation, describe the process used to generate this information (e.g. from transient and accident analyses)

for identifying instrumentation and control characteristics. This process can be described in either the PGP or in the function and task analysis portion of the Detailed Control Room Design Review Program Plan with appropriate cross-referencing.

- b. For plant-specific deviations from the instrumentation and controls specified in the generic technical guidelines and background documentation, 1) either identify all deviations, or describe the evaluation performed to determine the safety significance of the deviations and identify all safety-significant deviations, and 2) provide a technical justification for each deviation identified to the NRC. These should be submitted in the plant-specific technical guidelines should be submitted in the plant-specific technical guidelines portion of the PGP along with any technical deviations.
- c. For each instrument and control used to implement the EOPs, there should be a description of how the characteristics of the needed instrumentation and controls were determined. These characteristics should be derived from the information and control needs identified in the background documentation of Revision 1 of the ERG or from plant-specific information.

This information is needed to provide assurance that a sound basis and a formal, documented process are used for making current and future modifications to emergency operating procedures.