



**Consumers
Power**

**POWERING
MICHIGAN'S PROGRESS**

General Offices: 1945 West Parnall Road, Jackson, MI 49201 • (517) 788-0550

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Director,
Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, DC 20555

DOCKET 50-255 - LICENSE DPR-20 - PALISADES PLANT -
SUPPLEMENT 1 TO NUREG-0737 - RESPONSE TO DRAFT SAFETY EVALUATION REPORT -
PROCEDURES GENERATION PACKAGE

By letter dated June 29, 1984, Consumers Power Company submitted to the NRC the Procedures Generation Package (PGP) that would be used to develop the upgraded Emergency Operating Procedures (EOP) for the Palisades Plant. This submittal was made in response to the requirements of section 7.2 (b) of Supplement 1 to NUREG-0737 (Generic Letter 82-33) dated December 17, 1982. Subsequently, by a letter dated March 17, 1986 the NRC provided a draft Safety Evaluation Report (SER) of the Palisades Plant PGP. That draft SER concluded that, with certain exceptions identified in the SER, the PGP for the Palisades Plant met the requirements of Supplement 1 to NUREG-0737. The draft SER stated that the Palisades Plant PGP should be revised to address the concerns identified by the NRC and requested that the revised PGP be resubmitted for NRC review by June 30, 1986. This letter and attachments (ie, the revised PGP and associated procedures) addresses the concerns identified by the NRC in the draft SER and supersedes Consumers Power Company's submittal dated June 29, 1984.

The Palisades Plant EOPs are being upgraded in accordance with Combustion Engineering Generic Technical Guidelines (CEN-152, Rev 2). Attachment 1 to this letter provides a description of the deviations from and additions to the Generic Technical Guidelines that are of safety significance and have been incorporated into the Palisades Plant upgraded EOPs. In addition, the technical justification for each deviation and/or addition is also provided. Attachment 2 to this letter provides the Procedures Generation Package for the Palisades Plant. The PGP contains descriptions of the documents that constitute the Plant-Specific Technical Guidelines, and a description of the Writer's Guide, Validation program, and operator training program for the upgraded. Attachment 3, Palisades Nuclear Plant Administrative Procedure 4.06, "Emergency Operating Procedure Development and Implementation," is a

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permanent Plant document and describes the specific methods that will be used by Consumers Power Company to upgrade and maintain the EOPs. Detailed instructions for writing Plant specific EOPs including: numbering, headings, format, writing instructional steps, mechanics of style, and the general appearance of the EOPs are provide in this procedure.

The following material provides Consumers Power Company's response to the concerns identified by the NRC in the draft SER. The numbering of each item is consistent with the numbering adopted by the NRC in the draft SER.

NRC Concern

2.A.1 "Deviations from and additions to the generic technical guidelines that are of safety significance must be identified in the PGP. In addition, analyses or other technical justification supporting these deviations and additions must be provided. See Standard Review Plan Section 13.5.2, Appendix A for examples.

CPCo Response

Deviation from and addition to the generic technical guidelines are included in Attachment 1.

NRC Concern

2.A.2 "When there are deviations from the generic technical guidelines in the P-STG, the operator actions should be validated/verified to confirm their technical adequacy. The method(s) planned for conducting this validation/verification should be described in the PGP".

CPCo Response

The validation/verification program is described in Attachment 2.

NRC Concern

2.B.1 "In order to promote consistency among procedures written by different individuals, the format (such as single or dual column format) for presenting the action steps should be specified in the writer's guide".

CPCo Response

Procedure format is specified in Attachment 3, Section 6.4.1.

NRC Concern

- 2.B.2 "Information should be presented in procedures so that interruptions in its flow are minimal. To achieve this, each action step and each note should be completed on the page where it began. This guidance should be included in the writer's guide".

CPCo Response

This item is addressed in Attachment 3, Section 6.4.2.a.8

NRC Concern

- 2.B.3 "Abbreviations, acronyms, and symbols are discussed in Section 4.5 (pages 8 and 9) of the writer's guide. To ensure that abbreviations, acronyms, and symbols are used consistently and are recognizable by the operators, a list of acceptable abbreviations, acronyms, and symbols should be included in the writer's guide".

CPCo Response

This item is addressed in Attachment 3, Section 6.4.3.e.

NRC Concern

- 2.B.4 "Instructions should be written for various types of action steps that an operator may take to cope with different plant situations. The writer's guide should therefore address the format of the following types of action steps:

- a. Steps that are used to verify whether the objective of a task or sequence of actions has been achieved.
- b. Steps of a continuous or periodic nature (repeatedly performed).
- c. Steps for which a number of alternative actions are equally acceptable.
- d. Steps performed concurrently with other steps.

See NUREG-0899, Section 5.7., for additional guidance".

CPCo Response

These items are addressed in Attachment 3, Section 6.4.2.a.

NRC Concern

2.B.5 "The writer's guide describes and defines logic terms and their uses in Section 3.2 (pages 2 and 3). However, it is suggested that this section be revised to include examples of logic terms or sequences that should be avoided because the statements can be confusing and ambiguous, such as BEFORE. See NUREG-0899, Subsection 5.6.10, for additional guidance".

CPCo Response

This item is addressed in Attachment 3, Section 6.4.2.b

NRC Concern

2.B.6 "To minimize confusion, delay, and errors in execution of EOP steps, the following concerns should be addressed in the writer's guide:

- a. EOPs should be structured so that they can be executed by the minimum shift staffing and minimum control room staffing required by the facility's Technical Specifications.
- b. Instructions for structuring EOPs should be consistent with the roles and responsibilities of the operators.
- c. Action steps should be structured to minimize the movement of personnel around the control room while carrying out procedural steps.
- d. Action steps should be structured to avoid unintentional duplication of tasks.

See NUREG-0899, Section 5.8, for additional guidance".

CPCo Response

These items are addressed on Attachment 3, Section 6.4.2.a.

NRC Concern

2.B.7 "It is important that an operator be able to quickly access the relevant EOPs or portions of EOPs. The writer's guide should address the availability and accessibility of the EOPs and their various parts and sections. See NUREG-0899, Section 6.1, for additional guidance".

CPCo Response

This item is addressed in Attachment 3, Sections 6.9.1 through 6.9.3

NRC Concern

- 2.B.8 "Since copies of the EOPs should be complete (contain all of the information from the original) and legible, criteria regarding completeness and legibility of the reproduced copies should be addressed in the writer's guide".

CPCo Response

This item is addressed in Attachment 3, Section 6.9.5

NRC Concern

- 2.B.9 "When major changes occur in the plant design, the Technical Specifications, the technical guidelines, the writers guide, or plant procedures, then the EOPs may need to be revised. These revisions should be subject to the PGP process. The PGP or plant administrative procedures should provide instructions to use the PGP process in making future revisions to the EOPs".

CPCo Response

This item is addressed in Attachment 3, Section 6.9.7.

NRC Concern

- 2.B.10 "Each procedure should have a statement of scope or a descriptive title which describes to the operator the purpose and use of the procedure. The writer's guide and/or Administrative Procedure 10.41 (which contains guidelines concerning content of a procedure) should provide guidelines concerning scope statements and descriptive titles".

CPCo Response

This item is addressed in Attachment 3, Section 6.4.1.

NRC Concern

- 2.B.11 "To ensure that the reproduction or binding does not obscure material and to enhance the readability of the EOPs, the width of margins and the spacing of lines within the procedure should be adequate and should be specified in the writer's guide".

CPCo Response

This item is addressed in Attachment 3, Section 6.4.4.g.

NRC Concern

2.B.12 "It appears that capitalization is intended to be used as an emphasis technique (e.g., logic terms are capitalized in Section 3.2). The writer's guide should address the use of capitalization".

CPCo Response

This item is addressed in Attachment 3, Section 6.4.2.f.

NRC Concern

2.B.13 "Various types and styles of numerals can be used in procedures. e.g., roman, arabic, and equipment designators. The writer's guide should include guidance on which numerals are to be used and for what purpose".

CPCo Response

This item is addressed in Attachment 3, Section 6.4.3.d.

NRC Concern

2.C.1 "The types of personnel involved in the verification and validation process are identified, i.e., operators, engineers, trainers and EOP-Project Team members (SRO qualified Shift Engineers and others in the Operations Department). This area should be expanded to include a human factors expert, and to identify the roles and responsibilities of the member involved in the verification/validation process".

CPCo Response

This item is addressed in Attachment 3, Section 6.7.4.

NRC Concern

2.C.2 "The validation program should include a description of the criteria that will be used to select the simulator scenarios to be run during the validation process. The criteria should be developed on the basis of what is needed to validate the procedures. The criteria should ensure that single, sequential and concurrent failures are included. A review of the capabilities and the limitations of the simulator will then identify what can be validated on the simulator. For the parts of the EOPs that cannot be validated on the simulator, the criteria for selecting any additional validation that may be needed and the methods to be used, such as a control room walk-through, should be described".

CPCo Response

This item is addressed in Attachment 3, Section 6.7.5.

NRC Concern

2.C.3 "The validation program should address how the EOPs will be validated with the minimum control room staffing".

CPCo Response

This item is addressed in Attachment 3, Section 6.7.4.

NRC Concern

2.C.4 "Section 5, EOP Validation Program, states that any discrepancies discovered during the validation process will be corrected and revalidated if significant. The verification and validation program descriptions should be expanded to include the criteria for determining when the EOP revisions should be reverified and revalidated".

CPCo Response

This item is addressed in Attachment 3, Section 6.7.5.c.

NRC Concern

2.D.1 "The training program description should indicate that operators will be trained to use the EOPs as a team and that each operator is trained in the role that he would be expected to take in case of an actual emergency".

CPCo Response

This item is addressed in Attachment 3, Section 6.8.3.b.

NRC Concern

2.D.2 "The training program description should indicate the use of a wide variety of scenarios to fully exercise the EOPs on the simulator and expose the operators to multiple (simultaneous and sequential) failures".

CPCo Response

This item is addressed in Attachment 3, Section 6.8.3.b.

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NRC Concern

2.D.3 "The training program description should indicate that all EOPs will be exercised by each operator".

CPCo Response

This item is addressed in Attachment 3, Section 6.8.3.b.

Kenneth W Berry

Kenneth W Berry
Director, Nuclear Licensing

CC Administrator, Region III, USNRC
NRC Resident Inspector - Palisades

Attachments