

May 31, 1985



VIRGINIA POWER

Mr. Harold R. Denton, Director
Office of Nuclear Regulation
Attn: Mr. H. L. Thompson, Jr., Director
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Serial No. 85-370
NO/SRB:acm
Docket Nos. 50-280
50-281
50-338
50-339
License Nos. DPR-32
DPR-37
NPF-4
NPF-7

Gentlemen:

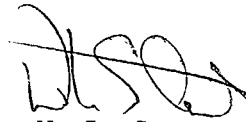
VIRGINIA POWER
SURRY POWER STATION
NORTH ANNA POWER STATION
PROCEDURE GENERATION PACKAGE SAFETY EVALUATION

In the telephone conference between Mr. H. B. Clayton of the NRC and representatives of Virginia Power, on April 29, 1985, we were asked to supply certain additional information to allow the close out of the Safety Evaluation (SER) of our Procedure Generation Package (PGP).

In accordance with this request, we are providing the following clarifications.

If you should need further assistance, please contact us.

Very truly yours,


W. L. Stewart

Attachment 1: Surry Power Station Clarification
Attachment 2: North Anna Power Station Clarification

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SURRY POWER STATION
PROCEDURE GENERATION PACKAGE CLARIFICATION

B. Writer's Guide

1.a. Line spacing criteria will be added to Writer's Guide Section 7.4. Included will be a statement reflecting the need to properly space procedure content for clarity. Specific requirements will be provided in the following areas.

- * Cautions
- * Notes
- * High level steps
- * Substeps
- * Paragraphs

Double spacing will be provided between Steps, Substeps, Notes, Cautions and paragraphs.

Single spacing will be provided between lines within a Step, Substep, Note or Caution.

1.b. Although the item is closed, the writer's guide will be reworded to state "The Caution statement, including the demarcation devices, will extend from the left margin to the right margin."

1.c. Continuation of step criteria will be added to the Writer's Guide section 7.5. Included will be statements reflecting desirability of limiting steps to one page. Additionally, the following guidance will be provided:

- * No portion of a single substep may be continued from one page to the next.
- * The following statement will be placed between the continued step and the bottom page margin "step (step #) continued next page".
- * The entire high level statement of the continued step will be repeated on the subsequent page followed by "continued".
- * Notes will receive similar treatment if extended beyond one page.

2.b. As defined by the Writer's Guide Table 1, certain words such as monitor, maintain and control imply a requirement

for continuous operator action. This concept will be included in a plant specific user's guide (to be developed prior to Rev. 1 implementation) and will be stressed during operator training. This information supplements procedural steps which reevaluate parameters in accordance with the Westinghouse Owners Group (WOG) guidelines.

- 2.c. If step completion or concurrent actions are required, this will be identified in the step requiring completion or by a note or caution statement.
- 4 Emergency Response Procedures (ERPs) will be maintained in the main control room in accordance with the User's Guide. Procedures will be placed in suitable binders with tabs for identification. A complete ERP set will be designated and readily available for the reactor operators (RO) for each unit.
- 6 Refer to the response for B.1.c. By the requirements, at least one high level numbered step designator will always be available on each page of an ERP.

D. Training

- 1 Emergency Response Procedures will be exercised by licensed operators by real time simulation, walk through, or table-top methods.
- 2 Wherever applicable, ERP training will exercise procedures using the site specific simulator. In those instances where simulator use is not practicable, the ERPs will be exercised during training by the table top, talk through method.

NORTH ANNA POWER STATION
PROCEDURE GENERATION PACKAGE CLARIFICATION

B. Writer's Guide

- 1.a. Line spacing criteria will be added to Writer's Guide Section 7.4. Included will be the statement: "Steps shall be properly spaced to enhance the readability of written instructions and reduce the probability of user error. Each step will be typed with single spacing provided between lines within a Step, Substep, Note or Caution and double spacing between Steps, Substeps, Notes, Cautions and paragraphs.
- 1.b. Although the item is closed, the writer's guide will be reworded to state "The Caution statement, including the demarcation devices, will extend from the left margin to the right margin."
- 1.c. Continuation of step criteria will be added to the Writer's Guide Section 7.4. Included will be statements reflecting desirability of limiting steps to one page. Additionally, the following guidance will be provided:
 - * No portion of a single substep may be continued from one page to the next.
 - * Steps that are continued from one page to the next shall have the statement, "step (step #) continued next page", between the continued step and the bottom page margin, noting that the step is continued on the following page.
 - * The entire high level statement of the continued step will be repeated on the subsequent page followed by "continued".
 - * Notes will receive similar treatment if extended beyond one page.
- 2.b. A "foldout" page will be provided on the reverse of the proceeding pages (excluding attachments) of Emergency Operating Procedures (EOPs) and Emergency Contingency Actions (ECA) series procedures as required to convey the need to continuously or periodically monitor necessary parameters and conditions.
- 2.c. If step completion or concurrent actions are required, this will be identified in the step requiring completion or by a note or caution statement.

- * A Caution statement will be added prior to the applicable step.
 - * High level action statements, which can be performed concurrently, will be followed with the statement "while continuing with this procedure:
 - * The sequencing of substeps will be denoted by letter or number designators.
- 4 A complete set of the Emergency Operating Procedures (EOPs) including ECAs and Function Restoration Procedures (FRPs) will be maintained in the main control room file cabinet. This file cabinet will be properly labeled and readily accessible to the operator. The procedures will be separated and properly tabbed for identification. EOPs may also be maintained and tabbed in the "Visible File".
- 6 Refer to the response for B.1.c. By the requirements, at least one high level numbered step designator will always be available on each page of an ERP.

D. Training

- 1 Emergency Response Procedures will be exercised by licensed operators by real time simulation, walk through, or table-top methods.
- 2 Wherever applicable, ERP training will exercise procedures using the site specific simulator. In those instances where simulator use is not practicable, the ERPs will be exercised during training by the table top, talk through method.