

# VERMONT YANKEE NUCLEAR POWER CORPORATION

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November 16, 1979

Dr. D. F. Ross, Jr., Director  
Bulletins and Orders Task Force  
Office of Nuclear Reactor Regulation  
U. S. Nuclear Regulatory Commission  
7920 Norfolk Avenue  
Bethesda, Maryland 20014

Subject: Revised NEDO-24708 Small Break Operator Guidelines

- References:
- (1) Letter, T. D. Keenan to D. F. Ross, Jr., "Modifications to NEDO-24708 Small Break Operator Guidelines," October 18, 1979
  - (2) Letter, T. D. Keenan to D. F. Ross, Jr., same subject, October 23, 1979
  - (3) Letter, D. F. Ross, Jr. to T. D. Keenan, "Evaluation of Small Break Loss-of-Coolant Accident Operator Guidelines," October 26, 1979

Dear Dr. Ross:

Your recent letter (Reference 3) requested that the BWR Owners' Group submit for your confirmation revised Owners' Group Small Break LOCA Operator Guidelines, and confirm the accuracy of your understanding of the Owners' Group phased approach to guideline implementation and operator retraining. This letter responds to that request.

The guidelines, revised per Commitments (1) through (5) of Reference 1 and commitment (1) of Reference 2, are being mailed to you on this date by General Electric. We believe that the revised guidelines are fully responsive to the intent of your staff.

Your understanding of the Owners' Group proposed two-phased approach to procedure modification, which was discussed in the meeting in your offices on October 25, 1979, between your staff and representatives of the Owners' Group and summarized in Reference 3, is substantially correct. We would like to take this opportunity to expand on your summary of our plans, to be certain that our intentions are completely clear and within the scope of your approval.

First, as agreed in the October 25, 1979, meeting, the guidelines have been modified beyond the commitments of References 1 and 2 by the addition of the following:

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- (1) Explicit mention of condensate pumps as low-pressure coolant injection sources;
- (2) Requirement for manual actuation of safety-relief valves in case the ADS cannot be automatically or manually actuated.

With these two additions, the revised guidelines incorporate all of the essential actions for the mitigation of inadequate core cooling due to mechanistic loss of inventory. Therefore, the first phase of procedure modification satisfies the intent of Item 4, "Implementation of emergency procedures and retraining related to inadequate core cooling," on Page 5 of Enclosure 6 of Darrell G. Eisenhut's September 13, 1979, letter to all operating nuclear power plants. Guidelines for procedures to assure core cooling (PTACC), which will deal with less mechanistic events which might lead to inadequate core cooling, will be submitted together with the guidelines for other, non-loss-of-coolant accident events in early 1980.

Second, the analyses of inadequate core cooling, previously targeted for November 16, 1979, will be transmitted to you on November 30, 1979. As agreed in the October 25, 1979, meeting, this delay is required in order to modify the guidelines as discussed above and commence the first phase of guideline implementation and operator retraining.

Third, the Owners' Group seminar for utility personnel responsible for procedure preparation and review was held November 7-8, 1979, in St. Louis, Missouri, thereby commencing the first phase of guideline implementation and operator retraining. The guidelines modified as discussed herein were distributed at this seminar and the considerations underlying these guidelines were discussed in detail. Consistent with the phased approach to guideline implementation and operator retraining, the considerations underlying the Loss of Feedwater (LOFW) flow charts (Figures 2.3.1.1a and b of NEDO-24708) were also discussed. It was decided that until guidelines for LOFW have been prepared, submitted and approved by your staff, no substantive changes in existing procedures for LOFW will be made.

Fourth, Item (iv) in Reference 3 calls for the second phase of procedure modification to "be in place in the spring-summer time span of 1980." As agreed in the October 25 meeting, the second phase implementation will commence when your final safety evaluation report on the last guideline is issued, and will require at the very least twenty-five (25) weeks to complete. It is the Owners' Group hope that this schedule will permit a Summer, 1980 completion; however, we cannot commit to a specific schedule at this time since your own review of all the guidelines is essential before the second phase commences.

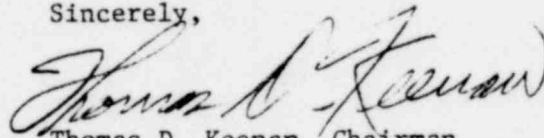
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Finally, Commitment (3) of Reference 2 stated that it would be confirmed that the analyses which support Contingency 3 in Guideline SBA-3 correctly reflected the specified time delay for ADS. The analysis in NEDO-24708 which supports ADS actuation at Level 1 for BWR/4, without a 120-second time delay, is the no-break case with low pressure systems only (Figure Group 3.1.1.1-58). This case is equivalent to an outside break with isolation at time zero, the case dealt with in Contingency 3. It is confirmed that this analysis considered the correct time delay, as is evident from inspection of Figure 3.1.1.1-58.2.

On behalf of the Owners' Group, I trust that this letter adequately responds to your requests in Reference 3, and that the additional clarifications herein agree with your understanding. If such is not the case, please advise me immediately.

Sincerely,



Thomas D. Keenan, Chairman  
General Electric Boiling  
Water Reactor Owners' Group

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cc: Owners' Group

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