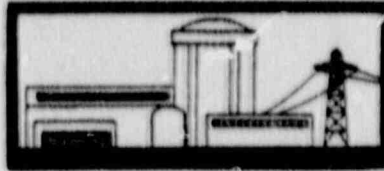


THE B&W OWNERS GROUP

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October 31, 1989
OG-595

Mr. D. M. Crutchfield
Division of Reactor Projects
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Subject: Status of B&W Owners Group Emergency Operating Procedures Review Project

Dear Mr. Crutchfield:

This letter is intended to provide you the status of the B&W Owners Group (B&WOG) Emergency Operating Procedures (EOP) project. The B&WOG made a commitment to perform a review of the EOPs as part of the Safety and Performance Improvement Program (SPIP). Section X-G of BAW-1919 defines the procedures review effort associated with the B&WOG reassessment:

The connection and interactions between the ATOG based EOPs and the procedures for abnormal plant configuration should be clear and concise with proper priorities maintained. The B&WOG will review this procedural hierarchy for each plant to determine if the proper links and priorities have been maintained and make recommendations on where improvements should be made.

The B&WOG Operator Support Committee (OSC) began an EOP Review Project in February 1988 to provide the procedural hierarchy evaluation. Since then, other tasks were added to the project to assist in closure of open ATOG SER items. These additional tasks include:

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- Development of a B&WOG Benchmark EOP
- Comparison of each B&WOG member's EOP to the Benchmark EOP
- Development of Operator Burden Criteria
- Development of flowcharts for each B&WOG member's EOP
- Comparison of all flowcharts to the B&WOG Benchmark EOP
- Development of a procedure hierarchy matrix

In 1988, a draft benchmark EOP was developed for review by the B&WOG OSC. This procedure was generated using the Abnormal Transient Operating Guidelines (ATOG). Meetings were held with the NRC in October and December 1988 to discuss the benchmark EOP and ATOG SER issues. The OSC agreed to design the benchmark EOP like the Technical Bases Document (TBD) instead of ATOG. This major scope shift prompted a complete rewrite. The new benchmark would then be added to the TBD. The new benchmark EOP was analyzed by the OSC and approved for use in the review project at a March 1989 meeting. The comparisons between the benchmark and utility EOPs began in April.

The comparison and review of the utility EOPs were very detailed. All differences between the benchmark and utility EOPs were annotated. The differences were divided into three categories; Technical Findings, Suggested Changes, and Operator Burden Issues. The proper intent of each procedure step as compared to the benchmark EOP was also assured during the process.

Four of the five B&WOG utility comparisons have been drafted including written reports. These reports are currently being reviewed by the utilities and will be finalized when the reviews are complete. The other B&WOG member is in the process of performing an in-house EOP upgrade program. As each procedure in this upgrade program is completed, it will be examined in the B&WOG Review Project. Because of this utility's decision to undertake this upgrade, completion on the same schedule as the other plants was not possible. This Review Project has been very intensive and has covered far more areas than the B&WOG originally anticipated when the SPIP commitment was made. The results have been very beneficial and significant improvements to the EOPs have resulted. The B&WOG considers the work completed at this time on the EOP Review Project to meet the intent of the original SPIP commitment. We will, however, provide the NRC with brief periodic status updates on the remaining work. In parallel with the EOP Review Project, intensive efforts have been underway to develop clear, mutual understandings of the ATOG SER open items. These efforts have involved numerous meetings and telephone calls between B&WOG representatives and the NRC staff.

As a result, there are very few unresolved items and progress in resolving those remaining is continuing.

The B&WOG appreciates the cooperative interactions with the NRC staff on the overall FOP program and looks forward to the formal closure of this issue.

Very truly yours,

W. T. O'Connor

W. T. O'Connor

Chairman

B&W Owners Group Steering Committee

WTO/leh

cc: B&WOG Steering Committee

D. H. Williams - AP&L
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 L. P. Simon - TE
 G. P. Morris - B&W

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