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AMERICAN ELECTRIC POWER Service Corporation



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(212) 440-9000

January 28, 1981
OG-48

Mr. Stephen S. Hanauer, Director
Division of Human Factors Safety
U.S. Nuclear Regulatory Commission
Phillips Building
7920 Norfolk Avenue
Bethesda, Maryland 20014



Dear Mr. Hanauer:

EMERGENCY OPERATING INSTRUCTION BACKGROUND DOCUMENTS

As requested in your December 17, 1980 letter to Mr. Roger Newton, enclosed you will find two (2) copies of the background information documents that supplement and support the Westinghouse Owners Group Reference Emergency Operating Instructions (EOI's). Two separate documents are being provided; one which applies only to plants with high head safety injection pumps having shutoff heads equal to or greater than normal operating pressure; and the second, which applies only to plants with high head safety injection pumps having shutoff heads lower than normal operating pressure. These documents are intended to provide the bases for and additional discussion on the action statements, precautions, and notes appearing in the EOI's.

With regard to the two specific NRC staff concerns raised in the December 17 letter, the following is provided:

- 1) The Westinghouse Owners Group and Westinghouse have initiated an investigation into the interactions between the Reactor Coolant System and the containment on a generic basis, using the event tree methodology described in WCAP-9691. This investigation will be included in the Action Program that was delineated in letter OG-47 (R. W. Jurgensen to S. S. Hanauer, dated December 15, 1980), through which it is intended to assure compliance with the requirements set forth in NUREG-0737, Item I.C.1.
- 2) At this time transition instructions between the EOI's and the Guidelines to Mitigate Inadequate Core Cooling (E²OI's) have not yet been finalized. These transition instructions are a topic of continuing discussion between the Westinghouse Owners Group and Westinghouse. However, the E²OI's themselves provide the symptoms of the onset of an inadequate core cooling condition, and the control room operator will be trained to recognize the symptoms and initiate mitigation actions as described in the E²OI's based upon those symptoms.

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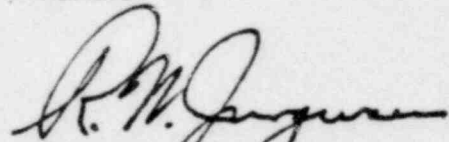
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As a policy matter, the Westinghouse Owners Group requires that all NRC correspondence (both addressed to and emanating from the Owners Group) be sent through its Chairman. In addition, a copy of all correspondence is to be sent to the Westinghouse Owners Group Project Manager, at the address given below.

Mr. Bruce King, Manager
Westinghouse Owners Group
Westinghouse Electric Corporation
Nuclear Service Division
P. O. Box 2728
Pittsburgh, PA 15230

The detailed program (Action Plan) which the Westinghouse Owners Group intends to follow to assure compliance with the requirements of NUREG-0737, Item I.C.1 was contained in our letter OG-47. As we discussed in our November 12, 1980 meeting, and in subsequent communications, the Westinghouse Owners Group plans to meet with members of your staff on February 20, 1981. The results of effort in support of our Action Plan as of that time will be presented and any questions which you or the staff may have concerning material previously submitted to the NRC will be addressed.

Very truly yours,



Robert W. Jurgensen, Chairman
Westinghouse Owners Group

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Attachments