



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

JUN 9 1981

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Docket No. 50-338



Mr. J. H. Ferguson
Executive Vice President - Power
Virginia Electric and Power Company
Post Office Box 26666
Richmond, Virginia 23261

Dear Mr. Ferguson:

The NRC staff has completed an interim review of the Westinghouse Owners Group submittal for Action Plan item I.C.1, Guidance for the Evaluation and Development of Procedures for Transients and Accidents. We have identified the following deficiencies in the Owners Group proposal:

1. Proposed guidelines do not provide smooth transitions from the event procedures to direct the operator if subsequent multiple or consequential failures occur.
2. The proposed schedule for completing the program does not appear responsive to NUREG-0737, Item I.C.1 and we believe that additional work is necessary.
3. The staff has serious doubts that the full range of initiating events and subsequent failures can be addressed within the proposed event specific framework.

A copy of our letter to the Owners Group is enclosed for your information.

Sincerely,

Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure:
As stated

cc: See next page

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Virginia Electric and Power Company

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Atomic Safety and Licensing
Appeal Board Panel
U.S. Nuclear Regulatory Commission
Washington, D. C. 20555



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAY 28 1981

Robert W. Jurgensen, Chairman
Westinghouse Owners Group
American Electric Power Service
Corporation
2 Broadway
New York, New York 10004

Dear Mr. Jurgensen:

In your letter dated March 18, 1981 (06-54), you summarized a meeting held on February 20, 1981 between representatives of the NRC staff, Westinghouse Owners, and Westinghouse Electric Corporation. The purpose of the meeting was to discuss the Westinghouse Owners Group (WOG) activities in response to NUREG-C737, Clarification of TMI Action Plan Requirements, Item I.C.1, Guidance for the Evaluation and Development of Procedures for Transients and Accidents. Following the meeting summary, you requested that the staff acknowledge the acceptability of the program described in the meeting.

As indicated in a meeting with Tom Anderson, of Westinghouse, on April 8, 1981, we have concerns about the acceptability of the WOG program. The last submittal of generic WOG guidelines, including the Inadequate Core Cooling Guidelines, required the operator to diagnose a specific event using the diagnostic procedure included in the guidelines. Subsequent failures were, essentially, addressed by entry into one of the inadequate core cooling guidelines. As indicated in the February meeting and discussed in your letter, the guidelines do not provide smooth transitions from the event procedures to direct the operator if subsequent multiple or consequential failures occur. This leaves the operator with no guidance until entry conditions for the Inadequate Core Cooling Guidelines are reached. Furthermore, the guidelines do not address subsequent reevaluation of plant conditions to ensure that the expected plant response is occurring.

Our second concern is your proposed schedule for completing the program recognizing that development of emergency operating procedures is a dynamic process with no absolute end point. However, we are concerned that continual, major rewriting of emergency operating procedures is a burden on plant operating staffs and confusing to the operators who must relearn the procedures. In the February meeting, WOG representatives indicated that they expect to have the initial development phase of the guidelines completed in July 1981, and would not expect major changes to the guidelines to result from the phases to be completed in January 1982 and July 1982. You also state in your letter that the initial phase will address over 98 percent of the total risk. However, we were also told in the meeting that the guidelines to be submitted in July would probably not differ greatly from those already submitted. Considering our concerns with the existing guidelines, as addressed above, we do not see how the July submittal can be responsive to NUREG-0737, Item I.C.1 without significant change. We believe that additional work is necessary.

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MAY 28 1981

The staff has not completed its review of WCAP 9691 or the probability estimates presented in the February meeting, and the Owners Group has not addressed the broad range of initiating events, including natural phenomena such as earthquakes, in the analysis presented to date. Therefore, we cannot assess the overall adequacy of the proposed program. Unless our concerns, as stated herein, are satisfied, the ability of licensees to meet the schedule for revising their procedures may be compromised.

As indicated in the April 8, 1981 meeting, we have serious doubts that the full range of initiating events and subsequent failures can be addressed within the event specific framework adopted by the Westinghouse Owners Group. If your additional work to date provides more insight into resolution of these concerns, we would be available to meet with you at your convenience.

By copy of this letter, each licensee and applicant of a Westinghouse-type plant, is being advised of our evaluation of your submittal.

Sincerely,



Darrell G. Eisenhut, Director
Division of Licensing

cc: E. Murphy
W Licensees
W Applicants