



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

SAFETY EVALUATED BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO THE PROCEDURES GENERATION PACKAGE  
NEBRASKA PUBLIC POWER DISTRICT  
COOPER NUCLEAR STATION  
DOCKET NO. 50-298

1. INTRODUCTION

The "TMI Action Plan" (NUREG-0660 and NUREG-0737) required licensees of operating reactors to reanalyze transients and accidents and to upgrade emergency operating procedures (EOPs) (Item I.C.1). The plan also required the NRC staff to develop a long-term plan that integrated and expanded efforts in the writing, reviewing, and monitoring of plant procedures (Item I.C.9). NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures," describes the use of a "Procedures Generation Package" (PGP) to prepare EOPs. A PGP is required by Generic Letter 82-33, Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability." The generic letter requires each licensee to submit a PGP, which includes:

- (i) Plant-specific technical guidelines
- (ii) A writer's guide
- (iii) A description of the program to be used for the validation of EOPs
- (iv) A description of the training program for the upgraded EOPs.

This report is the review of the Nebraska Public Power District (NPPD) submittal describing the development and implementation of EOPs (Section 7 of Generic Letter 82-33) for the Cooper Nuclear Station (CNS).

The review was conducted to determine the adequacy of the NPPD program for preparing, implementing, and maintaining upgraded EOPs for CNS. This review was based on NUREG-0800, Subsection 13.5.2, Standard Review Plan for the Review of Safety Analysis Reports for Nuclear Power Plants. Section 2 of this report briefly discusses the NPPD submittal, the NRC staff review, and the acceptability of the submittal. Section 3 contains the conclusions.

The staff determined that the procedure generation program for CNS has several items that must be satisfactorily addressed before the PGP is acceptable. NPPD should address these items in a revision to the PGP, or provide justification that revisions are not necessary. The revision and/or justification should not be submitted, but should be retained for subsequent review by the NRC staff. The revision of the PGP, and subsequently of the EOPs, should not impact the schedule for the use of the EOPs. The revision should be made in accordance with the CNS administrative procedures and 10 CFR 50.59.

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## 2. EVALUATION AND FINDINGS

In a letter dated June 29, 1984, NPPD submitted its PGP for CNS. The NRC reviewed this PGP and submitted to the plant a Request for Additional Information (RAI). In a letter from J. M. Pilant (NPPD) to W. O. Long (NRC), dated August 22, 1984, NPPD submitted a revised PGP. In a letter from G. A. Trevors (NPPD) to the NRC, dated March 31, 1988, NPPD submitted minor revisions to the training program. The revised PGP contained the following sections:

- ° Introduction
- ° Plant-Specific Technical Guidelines
- ° Writer's Guide for EOPs
- ° EOP Verification Program
- ° EOP Validation Program
- ° EOP Training Program
- ° EOP Revisions and Review

The review of the CNS PGP follows:

### A. Plant-Specific Technical Guidelines (P-STG)

Because staff evaluation of Revision 4 of the generic technical guidelines is now complete, the P-STG program description should be revised to conform with Revision 4 of the General Electric Boiling Water Reactor Owner's Group (BWROG) Emergency Procedure Guidelines (EPGs). Safety significant deviations from the BWROG Emergency Procedures Guidelines should be documented, justified, and archived for future reference.

### B. Writer's Guide

The writer's guide was reviewed to determine if it described acceptable methods for accomplishing the objectives stated in NUREG-0899. The writer's guide is designed to provide specific administrative and technical guidelines for preparing CNS EOPs. The objectives of the writer's guide are to ensure that each procedure is readily understood by the operators and is sufficiently comprehensive to be acceptable to the CNS Operations Department. The staff identified the following concerns:

1. The discussion of notes and cautions in writer's guide should be revised with regard to the following:
  - a. Section 5.4, page 12, states that "a caution shall not be used instead of an instructional step." Section 5.4 should be revised to specifically state that cautions should not contain operator actions.
  - b. Section 5.4, page 12, states that "a note should present information only, not instruction." But Section 5.1.q, page 8, states that notes should be used in order to advise the operator of those actions or observations which he will be required to perform following the initial action." Notes may be used to remind operators of steps that are coming up, but should not contain actions that are not repeated in other steps. Section 5.1.q should be revised to be consistent with Section 5.4.
  - c. Section 5.4, page 13, states that it is "permissible to separate the note from the applicable step to begin a new page as long as the note appears in sequence before the step." Section 5.4 should be revised to state that it is not permissible to separate the note from the applicable step to begin a new page.
  - d. Section 5.4, page 13, states that caution and note statements "should be short and concise," but it does not specifically state that each statement contain only one topic. If a note or caution statement contains more than one topic, the importance of any one topic is obscured. Section 5.4 should state that each note or caution will contain one and only one topic.
  - e. Section 7.7.f, page 29, which contains instructions for the replacement of cautions, includes the following sentence: "Start a new page if necessary add sentence on attached sheet." This sentence should be clarified.
2. The discussion of logic statements in the writer's guide should be revised with regard to the following:
  - a. Section 5.6, page 13, refers to BUT as a logic term. BUT should be removed from the list of logic terms in Section 5.6 because it is not a logic term - it is a conjunction.
  - b. Section 5.3.b, page 12, states that "if three or more conditions must be described before an action is directed, list the conditions separately from the action instruction." A list format is also mentioned in Section 5.2.a, page 10. However, no specific guidelines are provided. Section 5.3.b should be revised to include specific guidelines for formatting lists. An example should be provided.

- c. Section 5.3.d, page 12, refers to Appendix 5, page 43, for examples of conditional statements, but Appendix 5 only contains examples of IF and THEN. The writer's guide should provide additional examples of the use of the following logic terms: AND, the inclusive OR, the exclusive OR, AND and OR together, IF NOT, and WHEN.
  - d. Section 5.2, page 10, states that logic terms will be emphasized "by using capitalizations and underlining." Section 4.4, page 6, includes an example where the logic term IF is neither capitalized nor underlined. The example in Section 4.4 should be revised to conform to the guidelines prescribed in Section 5.2.
  - e. The contingency step for Step SP/T-2 in Appendix 5, page 43, reads as follows: "IF any stuck open SRV cannot be closed within two minutes, THEN close both recirculation flow control valves until an APFM UPSC alarm is received OR the minimum valve position, 0%, is attained, THEN open both recirculation valves." This step violates several rules for the use of logic statements: (1) the use of "until" indicates that the second part of this step should be broken into a separate logic statement (" WHEN an APFM UPSC alarm is received..."), (2) THEN is used to run actions together, and (3) the step is longer than the fifteen words specified in Section 5.1.b, page 6. This step should be rewritten so that logic terms are used correctly and should be broken into two steps.
  - f. Section 5.2, page 10, states that "the issue of AND and OR within the same action shall be avoided." There are occasions when it is necessary to use AND and OR in the same sentence. Section 5.2 should provide guidance and an example of acceptable usage of AND and OR together.
  - g. Section 6.7, page 24, instructs procedure writers to capitalize the first letter of each logic term. Section 5.2, page 10, indicates that logic terms should be fully capitalized. The writer's guide should be revised to eliminate this inconsistency.
3. Section 5.1, page 10, states that "flowchart information shall be formatted in a manner similar to instructional steps." Flowcharts (that is, instruction and decision symbols connected graphically) cannot be constructed in the same manner as text procedures. Therefore, procedure writers must be given information that applies directly to the formatting and use of flowcharts. The writer's guide should be revised with regard to the following:
- a. The writer's guide should include a list of all flowchart symbols, their meanings, and their use.
  - b. The writer's guide should specify the required size for symbols, lines, type, and other flowchart components. Flowchart components must be legible from the distance at which operators are expected to read them.

- c. Section 5.1, page 10, states that the flowchart or logic diagram of operator actions will be provided "if needed to clarify operator actions." Section 5.1 should be revised to include criteria about when to use flowcharts, and a discussion about how these flowcharts will relate to text procedures.
  - d. The writer's guide should describe how flowcharts will be produced and reproduced to maintain adequate readability.
  - e. The movement in flowcharts should be either from left-to-right or from top-to-bottom; only in situations such as loops should the movement be otherwise. The writer's guide should contain instructions to avoid upward and right-to-left movements in flowcharts except in specific situations, and examples should be provided that are consistent with the text.
  - f. The writer's guide should indicate that complete sentences are required in flowcharts.
  - g. Flowcharts cannot provide as much detail as written procedures. Flowcharts should provide enough detail to guide newly licensed operators, but not so much detail that the flowcharts become cluttered and unusable. The writer's guide should specifically address the level of detail to be included in flowcharts.
  - h. The writer's guide should state that notes and cautions will be placed on the flow path directly before the steps to which they apply.
  - i. If several flow path lines runs parallel to each other, operators may have difficulty following the correct line. The writer's guide should describe a method for ensuring that operators are able to differentiate between such lines.
  - j. The writer's guide does not include an example of a flowchart. Because of the complexity of flowcharts, the writer's guide should include an example of a properly formatted flowchart.
4. The discussion of referencing and branching in the writer's guide should be revised with regard to the following:
- a. Section 5.7, page 14, states that referencing "should be minimized. Branching should also be minimized. Section 5.7 should include a commitment to minimize branching.
  - b. Section 5.7, page 14, states that "when only a few steps are involved in the referencing, the steps should be restated in the section wherever they are needed." "Only a few steps" is a vague criterion. Section 5.7 should discuss more specific criteria, such as page length, to be used when deciding if the necessary steps should be included in the text of the procedure or if referencing should be used.

- c. Section 5.7, page 14, lists the terms to be used in referencing and branching. Appendix 1, page 36, indicates that the term "per" infers that "referencing the document is optional," but the referencing term "per" is not discussed in Section 5.7. Section 5.7 should be revised to provide complete guidance for constructing referencing and branching instructions in EOPs, including a discussion of the use of the term "per" for indicating optional referencing. Examples should be provided.
5. The discussion of emphasis techniques in the writer's guide should be revised with regard to the following:
    - a. Section 5.6.d, page 14, describes acceptable uses of underlining, and states that underlining may also be used "to alert personnel to important words or phrases." The overuse of underlining will detract from emphasis throughout EOPs. Section 5.6.d should specify that only those "important words or phrases" that are shown may be underlined. ("Except" should be deleted from this list; see Comment B.6.a.)
    - b. Section 6.7, page 24, describes acceptable uses of capitalization and states that capitalization "may also be used when special emphasis is required." The overuse of capitalization will detract from emphasis throughout EOPs. In addition, text written in all capitals is more difficult to read than text written in mixed case. Section 6.7 should specifically list words or phrases that should be capitalized.
  6. The discussion of vocabulary, syntax, and punctuation in the writer's guide should be revised with regard to the following:
    - a. Section 5.6.d, page 14, lists the words "except" as an important word that may be underlined. "Except" should not be used in EOPs because the qualifying condition introduced by "except" follows the action. In other words, if a step instructed operators to "Open all valves except Valve A," an operator might open every valve before reading the last part of the step. "Except" should be deleted from the list in Section 5.6.d and should not be used in EOPs.
    - b. Section 6.4.d, page 21, instructs procedure writers to define "key words that may be understood in more than one sense." Section 6.4.d should state that key words with more than one meaning will be avoided in EOPs, and such terms should be included in the list of words to avoid. If such key words must be used, they should be defined every time they appear in EOPs.
    - c. Section 5.9.a, page 16, and 6.4.c, page 21, discuss words that the procedure preparers should avoid. However, examples of specific words to avoid are not given. The writer's guide should be expanded to include a reference list of words to avoid.

- d. Section 5.1.b, page 6, refers to phrases. Sentence structure is an important factor in the presentation of information; complete sentences are more precise and are more easily understood. Section 5.1.b should state that all sentences will be complete.
  - e. Section 7.4, page 26, states that the breaking of words "should be avoided to facilitate operator reading." However, Appendix 5, page 43, shows words hyphenated at the ends of lines. The breaking of words between lines disrupts the flow of information. The breaking of words between lines should be eliminated in Appendix 5.
  - f. Section 6.2.b.4, 6.2.b.5, and 6.2.b.6, page 20, discuss hyphenation. The uses described in Sections 6.2.4 and 6.2.5 are not consistent with standard English usages, and the use described in Section 6.2.6 does not make the words less confusing. The writer's guide should be revised to state that hyphenation should not be used in these situations.
7. The writer's guide should provide instructions for writing the various types of action steps that a plant operator may take to cope with different plant situations. See NUREG-0899, Section 5.7, for further information. The writer's guide should be revised with regard to the following:
- a. Section 5.1.g, page 7, mentions non-sequential steps, but does not provide procedure writers with sufficient information regarding when non-sequential steps should be used and how they should be formatted. Section 5.1.g should describe the format of non-sequential steps and should provide an example that is consistent with the text.
  - b. Section 5.1.3, page 9, mentions verification steps, but does not tell procedure writers when verification steps should be used and how they should be formatted. The writer's guide should define verification steps and should provide an example that is consistent with the text.
  - c. Section 5.1.m, page 7, defines time-dependent steps, but does not specify how time-dependent steps should be formatted. The writer's guide should provide formatting instructions and an example that is consistent with the text.
  - d. Section 5.1.r, page 8, defines equally acceptable steps, but give little information regarding how this equally acceptable steps should be formatted. The writer's guide should discuss the formatting of equally acceptable steps and should provide an example that is consistent with the text. In addition, the writer's guide should state that only one alternative should be presented unless there is reason to believe that this alternative will not be available.

- e. The writer's guide does not address either recurrent steps or diagnostic steps. The writer's guide should define these types of steps and should provide examples.
- f. The writer's guide does not discuss the criteria for the sequencing of action steps. Action steps should be sequenced according to two criteria: technical necessity, and the physical layout of the control room. The writer's guide should specify that action steps will be sequenced accordingly.
- g. Section 5.1.0, page 8, states that additional information that clarifies an action may be placed "in the supplemental information column or on the facing page." Procedure preparers must be given specific guidelines for the placement of such information. Section 5.1.0 should be revised to (1) define supplemental information, (2) specify when supplemental information should be placed on the facing page and when it should be placed in the supplemental information column, and (3) explain how supplemental information differs from notes.
- h. Section 4.1, pages 3-4, states that the right column "is designated for contingency actions (to be taken when the expected response is not obtained) and for supplemental information." However, the writer's guide does not discuss how supplemental information will be formatted so that it is not confused with a contingency step. The writer's guide should be revised to address this point.
- i. Section 5.1.3, page 9, states, "Once an operator is directed to take an action in the contingency action column, an instruction will be placed at the end of the contingency action to direct the operator where to proceed to in the EOP." Such referencing should be minimized. No additional guidance is given to the procedure preparer regarding the formatting of the additional instruction. Furthermore, such instructions do not appear in the left column of the sample page in Appendix 5, page 43. Section 5.1.3 should be revised to explain when this reference is necessary and to describe formatting guidelines for the reference. Appendix 5 should be revised so that it is consistent with the text.
- j. Section 7.3.e.3, page 26, describes the procedure for starting a new page between substeps. Each action step should be contained on a single page. Furthermore, it appears that Step SP/T-2 in Appendix 5, page 43, has been split between two pages. Section 7.3.e.3 should be revised to state that steps will not be broken between pages; if an action step is longer than one page, that step is too long and should be rewritten as a series of shorter steps. Appendix 5 should also be revised.

8. The discussion of section headings and step numbers in the writer's guide should be revised with regard to the following:
  - a. Section 7.3, page 25, discusses the use of three levels of section headings, but does not discuss when each level of heading should be used, nor does it discuss how sections will be integrated with steps. Section 7.3 should be revised to clarify these points. The example presented in Appendix 5, which includes section headings and step numbers, should be revised to be consistent with this description.
  - b. Section 4.3.b, page 5, states, "Subsection headings (e.g., RC/L, PC/H) shall be centered and in all capitals. The headings shall be underscored." This format is not followed in Appendix 5, page 43. The writer's guide should be revised so that text and examples are consistent.
9. The discussion of acronyms and abbreviations in the writer's guide should be revised with regard to the following:
  - a. The writer's guide should specify that each acronym will have only one meaning and that any expression will be represented by only a one acronym, unless it would be impossible to follow this guidance due to conflicting control and markings.
  - b. Section 6.6, page 23, states, "The full meaning of the abbreviation, other than the abbreviations listed in Appendix 2, should be written in before the first use of the abbreviation and whenever in doubt." An operator might be branched into an EOP after an abbreviation has been initially defined. Section 6.6 should be revised to state that all definitions will be given in the list of approved abbreviations in Appendix 2 and that only abbreviations that have been specifically defined in that list will be used in EOPs. Furthermore, if there is any possibility of confusion over the meaning of an abbreviation, that abbreviation should not be used.
  - c. Section 6.6, page 24, states that "acronyms may be used if they are defined or approved for use." Only acronyms that have been specifically defined in the list of approved acronyms should be used in EOPs. Section 6.6 should be revised to state that all definitions will be given in the list of approved acronyms in Appendix 3, and that only acronyms that have been specifically defined in that list will be used in EOPs. Furthermore, if there is any possibility of confusion over the meaning of an acronym, that acronym will not be used.

10. The discussion of graphs, charts, tables, and figures in the writer's guide should be revised with regard to the following:
  - a. Section 7.6.g, page 27, discusses criteria for handwritten labels. Handwritten labels can be difficult to read. Section 7.6.g should be revised to indicate that handwritten labels are not allowed in figures.
  - b. Section 5.10, page 18, discusses printed operator aids. The writer's guide should be revised to include examples of the different types of printed operator aids that may be used.
11. It is important that the operators know where to find all of the instrumentation and controls that are referenced in EOPs. Section 5.8.d, page 16, states, "If the component is seldom used or it is felt that the component would be difficult to find, location information should be given in parentheses following the identification." In contrast, Section 5.1.4, pages 9-10, states that the "right-hand column and the facing page shall be used to provide . . . equipment and indicator locations." The writer's guide should be revised to eliminate this inconsistency. A properly formatted example of location information should also be provided.
12. The discussion of procedure organization in the writer's guide should be revised with regard to the following:
  - a. The writer's guide should be expanded to specify that the following information will appear on EOP cover pages: the procedure title, the revision number, the revision date, the total number of pages, review and approval signatures, and the facility designation. An example cover sheet should be provided.
  - b. Section 4.2, page 4, discusses entry conditions, but the writer's guide does not describe the format of entry conditions. The writer's guide should be revised to describe the format of entry conditions. An example should be provided.
  - c. Section 7.8, page 31, discusses foldout pages, but does not discuss the type of information that will be presented on foldout pages. If the right-hand column and the facing page are used to present supplemental information, it is not clear that foldout pages are necessary. If foldout pages are to be used, Section 7.8 should discuss exactly what will be presented on them. An example should be provided.
  - d. Section 7.2 c page 25, states that "rotation of printed matter should be avoided, however, this section then refers procedure writers to Section 7.5, page 26, "if rotation is absolutely necessary." Having to rotate pages in the middle of a step makes a procedure difficult to follow, increases delays, and may lead to operator error. Section 7.2.c should state that page rotation will not be allowed, and Section 7.5 should be deleted.

13. So that operators are always certain that they are using the correct procedure, EOPs should include identifying information in a consistent place on each page. Section 3.5, page 3, discusses the elements to be included on each EOP page. In addition to these elements, each page should also include the facility designation. Section 3.5 should be revised accordingly.
14. Section 7.2, page 25, states that "the right hand margin for [facing] pages shall be at least  $1\frac{1}{2}$  inch, where possible. The left hand margin for facing pages shall be at least  $\frac{1}{2}$  inch to prevent loss of material when reproduced." Specific margin guidelines (rather than minimums) should be provided. Section 7.2 should be revised to provide specific margin guideline for both right and left margins of facing pages.
15. Section 5.10.1, page 18, discusses units of measure in figures, tables, and attachments. Section 5.10.1 should state that all of the units of measure used in the EOPs, including those used in figures and tables, will be those in common usage and will be consistent with the units of measure shown on control room instrumentation.
16. Section 9, page 31, discusses the binding of each EOP for control room use, and states that each EOP will be "conspicuously marked so that it is readily identifiable as an emergency procedure." Because plant operators must have immediate access to the procedures, it is necessary that guidelines for marking the EOPs be explicit. Section 9 should be revised to include a description of exactly how the EOPs in the control room will be marked.

With adequate resolution of the above items, the CNS writer's guide should accomplish the objectives stated in NUREG-0899 and should provide adequate guidance for translating the technical guidelines into EOPs that will be usable, accurate, complete, readable, convenient to use and acceptable to control room operators.

#### C. Verification and Validation Program

The description of the verification and validation programs were reviewed to determine if they described acceptable methods for accomplishing the objectives stated in NUREG-0899. EOP verification is performed to confirm the written correctness of the procedure and to ensure that applicable generic and plant-specific technical information has been incorporated properly; this evaluation also checks that the human factors aspects presented in the EOP writer's guide have been applied. The EOP validation program is an evaluation process used to determine if the actions specified in the EOPs can be followed by trained operators to manage emergency conditions effectively. The staff identified the following concerns:

1. The verification program describes the verification that was performed on the existing EOPs but does not specify that the program will be followed in the future. The verification program should represent NPPD's plan for verifying current CNS EOPs as well as new or revised EOPs. For this reason, the verification program should include a detailed plan that NPPD has committed to follow for all future EOPs, rather than a description of the verification that occurred with the first set of EOPs. Furthermore, the validation program description should include a commitment to follow the validation program during future validation, rather than merely stating that the program "can also be applied to revalidation."
2. The verification and validation program descriptions should describe the methods that will be used in the verification and validation process. The verification and validation program descriptions should be revised to address the following:
  - a. The validation program should state that the full complement of EOPs will be revalidated on the plant reference simulator when one becomes available.
  - b. The verification and validation program descriptions should indicate that feedback from simulator exercises, control room walk-throughs, desk-top reviews, and operating team reviews will be used to ensure the accuracy, readability, useability, and completeness of the EOPs. A plan for obtaining and using this feedback in all future verification and validation should be described.
3. The validation program description should specify the criteria for selection of team members and the role and responsibilities of each individual.

With adequate resolution of the above items, the CNS verification and validation programs should accomplish the objectives stated in NUREG-0899 and should provide assurance that the EOPs adequately incorporate the guidance and will guide the operator in mitigating emergency conditions.

#### D. Training Program

The description of the operator training program on the CNS upgraded EOPs was reviewed to determine if it described acceptable methods for accomplishing the objectives stated in NUREG-0899. The initial EOP training was designed to support implementation of the EOPs; the training was closely tied to the verification and validation of the EOPs to ensure a supportive program. The staff identified the following concerns:

1. The training program describes the training that was performed on the existing EOPs but does not specify that this program will be followed in the future. The training program is intended to represent NPPD's plan for providing operator training on current EOPs as well as on new and

revised EOPs. Although the training program description discusses training following revisions to EOPs, it should include a commitment to follow the training program during future training.

2. The training program includes a description of objectives, but should also include the objective that, at the conclusion of training, trainee will understand the philosophy behind the EOPs; that is, trainees will understand the structure and approach of EOPs to transient and accident mitigation, including control of safety functions, accident evaluation and diagnosis, and the achievement of safe, stable, or shutdown conditions.
3. To ensure that the training methods used are adequate, the training program description should be expanded as follows:
  - a. The training program description should be expanded to indicate that all EOPs will be exercised by all operators on the simulator or, for those areas not conducive to simulator training, in control room walk-throughs.
  - b. The training program description discusses the use of multiple failure scenarios, but should specifically state that simultaneous and sequential failures will be included in simulator exercises and walk-throughs.
  - c. If a generic simulator is used, walk-throughs should be used to cover all EOPs. Walk-throughs should also be used for scenarios where the simulator does not behave in the same manner as the plant. All operators should participate in all such walk-throughs. Classroom training is not a substitute for simulator exercises or walk-throughs.
  - d. The training program description should indicate that operators will be trained to use the EOPs as a team, and that each operator will be trained in the role that he or she would be expected to take in an actual emergency.
4. Because the training program will be used when operators are trained on future revisions to EOPs, the training program should describe how the operators will be trained on those revisions prior to assuming the shift. This description should be expanded to include any distinctions in how major versus minor revisions are to be handled.

With adequate resolution of the above items, the CNS training program should accomplish the objectives stated in NUREG-0899 and should result in appropriate training for the CNS operators on the upgraded EOPs.

3. CONCLUSION

The staff concludes that, the PGP submitted by Nebraska Public Power District for Cooper Nuclear Station in letters to the NRC, dated June 29, and August 22, 1984 and March 31, 1988 should be reviewed to address the programmatic improvements outlined in Section 2 of this report. A PGP revision should not be submitted to the NRC. For items the licensee deems inappropriate or no longer applicable for inclusion in its PGP, it should develop and maintain documented justification in an auditable form. All revisions to the PGP should be reflected in plant EOPs within a reasonable period of time, e.g. the next planned revision of the EOPs.

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Dated: