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May 4, 1983

DARRELL G EISENHUT DIRECTOR
DIVISION OF LICENSING
UNITED STATES NUCLEAR REGULATORY COMMISSION
WASHINGTON DC 20555

SUBJECT: B&W OWNERS GROUP EMERGENCY PROCEDURES GUIDELINES (ATOG)

The purpose of this letter is to apprise you of the plans of the B&W Owners Group regarding Plant Emergency Procedure Technical Guidelines. As you know, the Owners Group has completed the Abnormal Transient Operating Guidelines (ATOG) Program which provided plant specific technical guidelines to each member utility. This effort has proven very valuable to each plant by establishing a basis for the implementation of upgraded emergency operating procedures. The purpose of ATOG has been to provide a symptom oriented approach to transient mitigation that would provide appropriate guidance to the operator for the major probable transients. In this manner, upgraded emergency procedures could be available in a timely manner to address the probable events in order to achieve a significant increase in plant operating safety. We consider that ATOG has fulfilled this purpose.

The task before us now is to expand on this base to address less probable scenarios, to provide guidance for thermal-hydraulic phenomena that were not considered in the original scope, and to provide for a long-term maintenance program to ensure the technical guidelines remain current with the resolution of issues, plant design changes, and improved control methods. We believe that the proper vehicle for this expanded scope is a generic set of technical guidelines applicable to all B&W plants.

The Owners Group has, therefore, decided to enhance our original plant specific ATOG with a higher level generic document which expands the technical bases for emergency plant operation. There are three reasons for this decision:

1. The Owners Group can more effectively maintain a generic technical guideline and implement changes and updates in a timely and effective manner.
2. A single document will reduce the staff effort to review and approve guideline changes.
3. The NRC, B&W, and the Plant Owners will all reference the same guidelines making understanding and utilization more effective.

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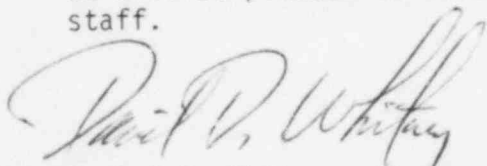
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Conceptually, the scope of this guideline is perceived to be at a high level covering the following:

1. The existing scope of Part I of ATOG.
2. Expanded operator actions and bases for ATWS.
3. Guidance on prevention, detection, and mitigation of RCS voids (including use of inventory measurement systems).
4. Guidance on inventory management and plant cooldown with multiple tube ruptures in one or both steam generators.
5. Guidance on containment actions with improved technical bases.
6. Guidance on Interrupted Natural Circulation during small break LOCA's.
7. Expanded entry conditions to cover a wider range of plant conditions.
8. Guidance on plant operation with loss of AC power.

As can be seen from this list, this is a considerable undertaking that involves a significant analytical effort; however, it is our intention to proceed along this path in a timely manner, starting immediately. We are currently developing an integrated plan which addresses the operating guideline needs of the Operator Support Committee (ATOG) and matches our current and planned analytical resources of the Analysis Committee with those needs.

As previously stated, this effort is in the conceptual stage. The B&W Owners Group Operator Support Committee will meet in June to discuss this program and approve specific plans. A more detailed schedule and discussion of the scope and format of the generic guidelines will be available for a meeting with the staff in late June. In the interim, we will be pleased to discuss the program goals and objectives with the staff.



Daniel D. Whitney, Chairman
B&W Owners Group Operator Support Committee

cc: B. Sharon, NRC, Bethesda, MA
Ed Wallace, Chairman
B&W Owners Group Steering Committee