BWR OWNERS' GROUP

T. J. Dente, Chairman

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(46 FR 34735)

August 17, 1981

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mdv

Secretary of the Commission
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

ATTENTION: Docketing and Service Branch

Gentlemen:

SUBJECT: Comments on NUREG-0799, "Draft Criteria for Preparation of Emergency Operating Procedures"

RECEIVED
AUG 2 6 1981
U.S. NUCLEAR REGULATORY COMMISSION

The Emergency Procedures Committee of the BWR Owners' Group has completed a preliminary review of NUREG-0799, "Draft Criteria for Preparation of Emergency Operating Procedures" which was published, for comment, in June 1981.

Members of the Committee are concerned over several aspects of what the NRC evidently considers an acceptable program for development of nuclear power plant emergency operating procedures. Particularly significant is the fact that portions of the proposed program conflict with the content and format of the BWR Emergency Procedure Guidelines which have been reviewed and approved by the NRC Procedures and Test Review Branch. The proposed program is also inconsistent with many BWR plant-specific emergency operating procedures that have been developed from the BWR Emergency Procedure Guidelines and which have been reviewed and approved by the NRC Staff as part of the Staff's pilot monitoring of emergency procedures for near-term operating license applicants.

Rather than detailing a list of specific comments, it is believed that resolution of the various issues regarding the draft criteria of NUREG-0799 would best be handled through a meeting between the NRC staff and members of the BWR Emergency Procedures Committee. Such a meeting would facilitate interaction among the principals

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to the greatest extent possible, offering an opportunity for all participants to fully explain their viewpoints and, through discussion, establish a mutually acceptable program plan.

We look forward to working with you further on this subject.

Sincerely,

T. J. Dente, Chairman
BWR Owners' Group

TJD:JFS:na

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