

07.496-91

OCT 5 1989

Stephen D. Floyd, Chairman  
BWR Owners' Group  
c/o Carolina Power and Light Company  
411 Fayetteville Street  
Raleigh, NC 27602

Dear Mr. Floyd:

SUBJECT: BWR EMERGENCY PROCEDURE GUIDELINES, REV. 4, NEDO-31331, MARCH 1987

References: Letter (BWROG-8964) from S.D. Floyd (BWROG) to A.C. Thadani (NRC),  
dated August 17, 1989.

In the referenced letter, the Owners' Group requested a clarification to the SER cover letter statement that "... licensee who wishes to use the Revision-4 of the Emergency Procedure Guidelines (EPG) should assure that the EPGs will not impact its licensing basis." This letter provides the requested clarification.

The staff recognizes that the EPG addresses a wide range of postulated events including anticipated transients, design basis accident (DBAs), and events beyond the plant's licensing basis as a result of multiple equipment failures or operator errors. To provide operator guidance for responding to this set of postulated events, the EPG uses a symptom-based approach and specifies use of nonsafety grade equipment, not used in performing the plant safety analyses, and safety grade equipment. This approach is consistent with the requirements of NUREG-0737 Item I.C.1.

However, for those postulated anticipated transients and DBAs analyzed in the FSAR, it was recognized that certain plant specific operator actions may have been assumed to assure conformance with the applicable regulatory requirements. Given the generic approach utilized to perform the EPG review, the staff could not assure that these plant specific actions were specified in the EPG. Each licensee will use the EPG to develop a plant specific set of Emergency Operating Procedures (EOPs). Following the development of these EOPs, the staff expects each licensee to assure that the EOPs either include those plant specific operator actions specified in the FSAR or provide operator actions which still ensure that the regulatory requirements are satisfied for those events specifically analyzed in the FSAR.

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For those events which are beyond the specific conditions analyzed as part of the FSAR, it is recognized that the EOPs may result in actions not previously specified in the FSAR. These actions were generically examined by the staff as part of the EPG review and were found appropriate for the extreme situations which require their use. Thus, further evaluation of those actions is not required.

If you require any questions regarding the implementation of the EPG, please contact Robert Jones of my staff at 301-492-3232.

Sincerely,

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Ashok C. Thadani, Director  
Division of Systems Technology  
Office of Nuclear Reactor Regulation

- cc: F. Miraglia
- M. Rubin
- C. E. McCracken
- J. Kudrick
- D. Florek (Region I)
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