



UNITED STATES
NUCLEAR REGULATORY COMMISSION
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MEMORANDUM FOR: D. F. Ross, Director, Bulletins and Orders Task Force
FROM: Cecil Thomas, Project Manager, Projects Group, B&OTF
THRU: W. F. Kane, Acting Leader, Projects Group, B&OTF
SUBJECT: RECOMMENDATION FOR LICENSEES TO DEVELOP SYMPTOM-BASED
EMERGENCY OPERATING PROCEDURES

During our October 25, 1979 meeting with the GE BWR Owners' Group, the Owners' Group advised us that following our approval of the guidelines associated with small-break LOCA's, inadequate core cooling, and transients and accidents, it plans to embark on a new emergency operating procedure philosophy. This philosophy would involve restructuring and reformatting the emergency operating procedures presently in use at operating BWR plants on a "symptom" basis, as opposed to the more "event-specific" basis on which these procedures have evolved.

The symptom-based emergency procedures would be categorized according to general plant symptoms, such as loss-of-coolant inventory, as opposed to the several separate existing associated procedures such as LOCA inside containment, LOCA outside containment and loss of normal feedwater. The loss-of-coolant inventory procedure would include the essential features of those existing procedures associated with LOCA inside containment, LOCA outside containment, and loss of normal feedwater, but would make use of the fact that the initial operator responses for the latter procedures are similar. The principal advantages of the symptom-based emergency procedures over the event-specific procedures are (1) the procedures as a whole would be simplified significantly and would, therefore, not require the operator to make a detailed diagnosis of the plant conditions prior to consulting an emergency procedure, (2) the total number of emergency procedures with which the operator would have to contend during an emergency would be reduced significantly, and (3) such an exercise would necessitate that the licensees look again at their emergency procedures in a more integrated manner.

I believe that the aforementioned advantages would contribute significantly to the ability of the operator to maintain the plant in a safe condition in the event of an emergency. Accordingly, I suggest that consideration be given to including in our generic reports the recommendation that those licensees whose emergency procedures are event-specific restructure and reformat them on a

D. F. Ross

-2-

DEC 5 1979

symptom basis. Such an effort, if recommended, could reasonably be accomplished by January 1, 1981.

Cecil Thomas

Cecil Thomas, Project Manager
Projects Group
Bulletins and Orders Task Force

cc: Z. Rosztoczy
S. Israel
W. Hodges
P. O'Reilly
I. Villalva
R. Capra