



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

OCT 21 1980

50-133 P

Mr. S. T. Rogers
Pacific Gas and Electric Company
Room 1481
77 Beale Street
San Francisco, California 94106

Dear Mr. Rogers:

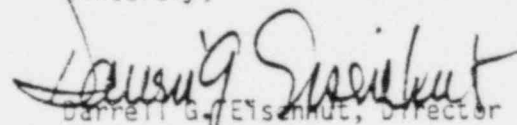
By a letter dated June 30, 1980, Mr. R. H. Buchholz forwarded the GE Emergency Procedure Guidelines to D. G. Eisenhut. On August 7 and 8, 1980, we met with representatives of the GE Owners' Group, General Electric Company and Commonwealth Edison (LaSalle Nuclear Station) to discuss the Emergency Procedure Guidelines, Revision 0, June 30, 1980. Based on the results of that meeting and the review conducted to date by the staff, we find the Emergency Procedure Guidelines acceptable for trial implementation at the LaSalle, Zimmer, Shoreham, Fermi 2, Susquehanna, and Washington Nuclear Project 2 stations. This letter is sent to you as Chairman of the BWR Emergency Procedures Group on behalf of the participants.

During the course of implementation we may identify areas that require modification or further analysis and justification. Since we anticipate that changes will be necessary regarding detailed guidance, your training program should properly account for such future procedural revisions. We will inform you of these areas as our review proceeds.

We recognize that postulating multiple equipment failures and operator errors can lead to situations that place a plant outside the limits of its technical specifications. While we in no way encourage deliberate operation outside of technical specification limits, we agree that the guidance provided in the draft guidelines is necessary to encompass the range of contingencies required when multiple failures are postulated. Operator training in use of the new procedures developed from these guidelines must stress this point and will be reviewed during our plant-specific reviews.

In our review to date, we have identified several areas where additional information is required. These areas are identified in the enclosure to this letter. Please inform us by October 27, 1980, of your schedule for submitting this information.

Sincerely,


Barrett G. Eisenhut, Director
Division of Licensing

Enclosure:
Request for Additional
Information

8011040 079



Dr. Wayne H. Jens
Assistant Vice President
Engineering & Construction
Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

cc: Eugene B. Thomas, Jr., Esq.
LeBoeuf, Lamb, Leiby & MacRae
1333 New Hampshire Avenue, N. W.
Washington, D. C. 20036

David E. Howell, Esq.
21916 John R
Hazel Park, Michigan 48030

Peter A. Marquardt, Esq.
Co-Counsel
The Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

Mr. William J. Fahrner
Project Manager - Fermi 2
The Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

Mr. Larry E. Schuerman
Licensing Engineer - Fermi 2
Detroit Edison Company
2000 Second Avenue
Detroit, Michigan 48226

Charles Bechhoefer, Esq., Chairman
Atomic Safety & Licensing Board
Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dr. David R. Schink
Department of Oceanography
Texas A & M University
College Station, Texas 77840

Mr. Frederick J. Shon
Atomic Safety & Licensing Board
Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. R. H. Buchholz, Manager
BWR Systems Licensing
Nuclear Safety & Licensing Operation
General Electric Company
175 Curtner Avenue
San Jose, California 95125

Mr. Earl A. Burgmann
Vice President - Engineering
Cincinnati Gas & Electric Company
P. O. Box 960
Cincinnati, Ohio 45201

cc: Troy B. Conner, Jr., Esq.
Conner, Moore & Corber
1747 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

Mr. William J. Moran
General Counsel
Cincinnati Gas & Electric Company
P. O. Box 960
Cincinnati, Ohio 45201

Mr. William G. Porter, Jr.
Porter, Stanley, Arthur
and Platt
37 West Broad Street
Columbus, Ohio 43215

Mr. Steven G. Smith, Manager
Engineering & Project Control
Dayton Power & Light Company
P. O. Box 1247
Dayton, Ohio 45401

J. Robert Newlin, Counsel
Dayton Power & Light Company
P. O. Box 1247
Dayton, Ohio 45401

Mr. James D. Flynn, Manager
Licensing Environmental Affairs
Cincinnati Gas & Electric Company
P. O. Box 960
Cincinnati, Ohio 45201

Mr. J. P. Fenstermaker
Senior Vice President-Operations
Columbus & Southern Ohio
Electric Company
215 North Front Street
Columbus, Ohio 43215

David Martin, Esq.
Office of the Attorney General
209 St. Clair Street
First Floor
Frankfort, Kentucky 40601

Dr. Frank F. Hooper
School of Natural Resources
University of Michigan
Ann Arbor, Michigan 48109

Charles Bechhoefer, Esq., Chairman
Atomic Safety & Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Glenn O. Brign
Atomic Safety & Licensing Board Panel
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Leah S. Kosik, Esq.
3454 Cornell Place
Cincinnati, Ohio 45220

W. Peter Heile, Esq.
Assistant City Solicitor
Room 214, City Hall
Cincinnati, Ohio 45220

Timothy S. Hogan, Jr., Chairman
Board of Commissioners
50 Market Street
Clermont County
Batavia, Ohio 45103

John D. Woliver, Esq.
Clermont County Community Council
Box 181
Batavia, Ohio 45103

Mrs. Mary Reder
Box 270, Rt. 2
California, Kentucky 41007

Dale D. Brodkey
Assistant Attorney General
Division of Environmental Law
Office of Attorney General
209 St. Clair Street
Frankfort, Kentucky 40601

Mr. J. S. Abel
Director of Nuclear Licensing
Commonwealth Edison Company
Post Office Box 767
Chicago, Illinois 60690

cc: Richard E. Powell, Esq.
Isham, Lincoln & Beale
One First National Plaza
2400
Chicago, Illinois 60670

Dean Hansell, Esquire
Assistant Attorney General
188 West Randolph Street
Suite 2315
Chicago, Illinois 60601

Mr. Roger Walker, Resident Inspector
U. S. Nuclear Regulatory Commission
Post Office Box 737
Streator, Illinois 61364

Mr. M. S. Pollock
Vice President - Nuclear
Long Island Lighting Company
175 East Old Country Road
Hicksville, New York 11801

ccs:
Howard L. Blau, Esq.
Blau and Cohn, P.C.
217 Newbridge Road
Hicksville, New York 11801

Jeffrey Cohen, Esq.
Deputy Commissioner and Counsel
New York State Energy Office
Agency Building 2
Empire State Plaza
Albany, New York 12223

Energy Research Group, Inc.
400-1 Totten Pond Road
Waltham, Massachusetts 02154

Irving Like, Esq.
Reilly, Like and Schnieder
200 West Main Street
Babylon, New York 11702

J. P. Novarro
Project Manager
Shoreham Nuclear Power Station
P. O. Box 618
Wading River, New York 11792

W. Taylor Reveley, III, Esq.
Hunton & Williams
P. O. Box 1535
Richmond, Virginia 23212

Ralph Shapiro, Esq.
Canner & Shapiro
9 East 40th Street
New York, New York 10016

Edward J. Walsh, Esq.
General Attorney
Long Island Lighting Company
250 Old Country Road
Mineola, New York 11501

Resident Inspector/Shoreham NPS
c/o U.S. Nuclear Regulatory Commission
P. O. Box 8
Rocky Point, New York 11778

Honorable Peter Cohalan
Suffolk County Executive
County Executive/Legislative Building
Veteran's Memorial Highway
Hauppauge, New York 11788

David Gilmartin, Esq.
Suffolk County Attorney
County Executive/Legislative Building
Veteran's Memorial Highway
Hauppauge, New York 11788

MHD Technical Associates
1723 Hamilton Avenue - Suite X
San Jose, California 95125

Stephen Latham, Esq.
Twomey, Latham & Schmitt
P. O. Box 298
33 West Second Street
Riverhead, New York 11901

Joel Blau, Esquire
New York Public Service Commission
The Governor Nelson A. Rockefeller Bldg.
Empire State Plaza
Albany, New York 12223

Mr. Norman W. Curtis
Vice President - Engineering
and Construction
Pennsylvania Power and Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

cc: Mr. Earle M. Mead
Project Engineering Manager
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Jay Silberg, Esq.
Shaw, Pittman, Potts &
Trowbridge
1800 M Street, N. W.
Washington, D. C. 20036

Mr. William E. Barberich,
Nuclear Licensing Group Supervisor
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Edward M. Nagel, Esquire
General Counsel and Secretary
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Bryan Snapp, Esq.
Pennsylvania Power & Light Company
2 North Ninth Street
Allentown, Pennsylvania 18101

Robert M. Gallo
Resident Inspector
P. O. Box 52
Shickshinny, Pennsylvania 18655

Susquehanna Environmental Advocates
c/o Gerald Schultz, Esq.
500 South River Street
Wilkes-Barre, PA 18702

John L. Anderson
Oak Ridge National Laboratory
Union Carbide Corporation
Bldg. 3500, P. O. Box X
Oak Ridge, Tennessee 37830

Mr. E. B. Poser
Project Engineer
Bechtel Power Corporation
P. O. Box 3965
San Francisco, California 94119

Matias F. Travieso-Diaz, Esq.
Shaw, Pittman, Potts &
Trowbridge
1800 M Street, N. W.
Washington, D. C. 20036

Dr. Judith H. Johnsrud
Co-Director
Environmental Coalition on
Nuclear Power
433 Orlando Avenue
State College, PA 16801

Mr. Thomas M. Gernsky, Director
Bureau of Radiation Protection
Department of Environmental
Resources
Commonwealth of Pennsylvania
P. O. Box 2063
Harrisburg, PA 17120

Ms. Colleen Marsh
Box 538A, RD#4
Mountain Top, PA 18707

Mrs. Irene Lemanowicz, Chairperson
The Citizens Against Nuclear
Dangers
P. O. Box 377
RD#1
Berwick, PA 18503

Mr. J. W. Millard
Project Manager
Mail Code 394
General Electric Company
175 Curtner Avenue
San Jose, California 95125

Mr. R. L. Ferguson
Managing Director
Washington Public Power Supply System
P. O. Box 901
3000 George Washington Way
Richland, Washington 99352

cc:
Joseph R. Knotts, Jr., Esq.
Debovoise & Liberman
1200 Seventeenth Street, N. W.
Washington, D. C. 20036

Richard Q. Quigley, Esq.
Washington Public Power Supply System
P. O. Box 968
Richland, Washington 99352

Nicholas Lewis, Chairman
Energy Facility Site Evaluation Council
820 East Fifth Avenue
Olympia, Washington 98504

Mr. O. K. Earle
Licensing Engineer
P. O. Box 967
Richland, Washington 99352

Mr. Albert D. Ioth
Resident Inspector/NPPSS-2 NPS
c/o U. S. Nuclear Regulatory Commission
P. O. Box 69
Richland, Washington 99352

REQUEST FOR ADDITIONAL INFORMATION
EMERGENCY PROCEDURE GUIDELINES
DRAFT 0, JUNE 30, 1980

1. The guidelines reference an Appendix A. We understand that Appendix A provides the methods of calculating the limits specified in the guidelines and the bases for those guideline steps for which the bases are not obvious. Please provide 5 copies of Appendix A to the guidelines.
2. Step C1-7.2 on page C1-4 calls for manual actuation of the ADS valves when the water level reaches the top of the active fuel. Analyses previously submitted have assumed earlier ADS actuation. Provide analyses to show that actuation when the water level reaches the top of the active fuel provides adequate core cooling.
3. Step C3-1 on page C3-1 calls for staged opening of SRV's for the case of core cooling without injection. Provide analyses to support the table given in step C3-1.
4. Cautions 4, 5, 13, 18 and step CC-2.4.2 require the operator to verify adequate core cooling. Describe the various means available to the operator for doing so. Where reliance is on observation that various systems are functioning, provide analyses to show that those systems are adequate.