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Dalwyn R. Davidson
VICE PRESIDENT
SYSTEM ENGINEERING AND CONSTRUCTION

November 16, 1982

Mr. A. Schwencer, Chief
Division of Licensing
Licensing Branch No. 2
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Perry Nuclear Power Plant
Docket Nos. 50-440; 50-441
Response to Request for
Additional Information on SER
Outstanding Issue No. 21

Dear Mr. Schwencer:

This letter and its attachments are provided in response to your letter of September 8, 1982, and our letter of September 28, 1982, regarding SER Outstanding Issue No. 21 (SER Section 13.5.2.2, Reanalysis of Transients and Accidents; Development of Emergency Operating Procedures). Responses to question numbers 640.1 and 640.2 identified in Enclosure (1) to your letter are attached.

We believe that this information should resolve these confirmatory issues in the next Supplementary Safety Evaluation Report (SSER No. 2).

If you have any questions, please contact me.

Very truly yours,

Dalwyn R. Davidson
Vice President
System Engineering and Construction

DRD:mb

cc: Jay Silberg, Esq.
John Stefano
Max Gildner
R. Stratman

B001

640.1 Provide a procedures generation package to include the following items:

a. Plant-Technical Guidelines: Since CEI has committed to using the generic General Electric Technical Guidelines, this consists of a description of the planned method for developing plant-specific emergency operating procedures (EOP's) from the generic guidelines, including plant-specific information.

b. Writer's Guide, detailing the specific methods for preparing EOP's based on the Technical Guidelines.

c. A description of the EOP validation program.

d. A brief description of the EOP training program.

RESPONSE

640.1 a,b The emergency procedure guidelines developed by the BWR Owner's Group, are generic to General Electric BWR-1 through 6 designs in that they address all major systems which may be used to respond to an emergency. Because no specific plant includes all of the systems in these guidelines, the guidelines are applied to Perry by deleting statements which are not applicable or by substituting equivalent systems where appropriate. Further, the emergency procedure guidelines include a number of plant specific limits, setpoints and action levels. Appendix C to the generic emergency procedure guidelines provides detailed directions for performing all necessary plant unique calculations for these limits, setpoints or action levels. Included in this appendix are:

1) cross-reference to data necessary to perform the calculation.
2) a list of input data necessary to perform the calculation.
3) A technical description of the calculational procedure and derivation of the governing equations.
4) Sample equations.

The Perry Plant Emergency Instructions (equivalent to EOP's) will be prepared by an operations engineer who has participated on the BWR Owner's Group emergency procedures development for almost two years. He will receive assistance from the plant technical staff when required in the generation of Perry Plant specific limits, setpoints and action levels. The emergency procedures will be prepared in accordance with a Writer's guide which is in preparation. The Writer's Guide will be based on the "Emergency Operating Procedures Writing Guideline" developed by the Emergency Operating Procedures Implementation Assistance Program, INPO document 82-017, dated July 1982. The information in this document which presents several different formats as well as generic guidance will be condensed and formed into a Perry Plant specific Writer's Guide. The schedule for the Perry

unique Writer's Guide is January 1983.

Upon completion of the development of the Plant Emergency Instructions, a verification program will be implemented. This program will provide for reviews of the Plant Emergency Instructions by operations personnel, the plant technical staff and by General Electric personnel. These documented reviews will verify compliance of the Plant Emergency Instructions with the emergency procedure guidelines, the FSAR, the Writer's Guide and plant design data.

640.1 c. The Plant Emergnecy Instructions will undergo a validation program which includes the following elements:

a) Plant walkthroughs by members of the Operations section. These walkthroughs will verify the usability of the instructions with respect to both the operator and the equipment.

b) Simulator exercises and training will also be used to verify the usability of the Plant Emergency Instructions.

640.1 d. Licensed operators will receive training in the use of the Plant Emergency Instructions as part of initial license training. This will include the use of these instructions in simulated abnormal plant conditions on the Perry plant specific simulator.

640.2 Provide your Reactivity Control (ATWS) procedure. The procedure should meet the requirements of IE Bulletin 80-17, "Failure of Control Rods to Insert During a Scram at a BWR".

RESPONSE

Revision 2 of the Emergency Procedure Guidelines incorporated the requirements for reactivity control in abnormal plant conditions including a failure of the scram system. Thus, there will not be a Reactivity Control Procedure as such. Rather, such procedures addressed a part of the Plant Emergency Instructions which are currently in preparation as outlined in the response to 640.1. The requirements of IE Bulletin 80-17 have been incorporated in Rev. 2 of the EPG's.