

Alabama Power Company  
600 North 18th Street  
Post Office Box 2641  
Birmingham, Alabama 35291  
Telephone 205 250-1000



December 3, 1982

Mr. D. G. Eisenhut  
Director, Division of Licensing  
Office of Nuclear Reactor Regulation  
Washington, D.C. 20555

Summary of NUTAC and NRC Meeting  
of October 21, 1982

Dear Mr. Eisenhut:

On October 21, 1982, the Chairman and Vice-Chairman of the Nuclear Utility Task Action Committee (NUTAC) on Emergency Response Capabilities (SECY 82-111) met with you and members of your staff to discuss the action of that committee. Attachment 1 is the Charter and Charter Supplement that authorizes the formation of the NUTAC on Emergency Response Capabilities and defines its organization and objectives. Presently, there are two other NUTACs addressing Safety Parameter Display System (SPDS) and Control Room Design Review (CRDR). In addition, a utility working group has been formed to address emergency operating procedures and functions in a manner similar to the NUTACs.

Attachment 2 is a summary of the ongoing and planned activities of the NUTAC on Emergency Response Capabilities which were discussed in the meeting of October 21, 1982. This course of action was subsequently approved by the thirty-three represented utilities during the NUTAC meeting of October 26, 1982.

This course of action is designed to develop the guidelines (deliverables) identified in the Charter and to facilitate the implementation of the provisions of SECY 82-111 by the individual utilities. It should be noted that the deliverables will be generic to allow for: the various degrees of previously completed action; the various methods of complying with the provisions of SECY 82-111; and unique plant features.

The scope, detail and time for integration of activities associated with SECY 82-111 may necessitate most utilities to utilize "preliminary schedules" pending completion of the NUTAC deliverables that the utilities intend to employ. However, the

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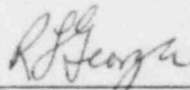
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NUTAC course of action does not incorporate provisions that are dependent on the completion of all deliverables before procurement of hardware is initiated. It is recognized that the implementation schedules cannot be finalized until the NUTAC deliverables are complete.

All deliverables are currently scheduled to be completed by the end of May 1983, with the exception of the last phase of Verification and Validation (V&V) which may include an actual demonstration of the generic V&V NUTAC guidelines. This phase would be completed by December 1983.

On behalf of the NUTAC and its membership, we appreciate the opportunity to discuss the NUTAC course of action. If there are any questions or comments, please contact either of the undersigned.

Yours truly,



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R. L. George  
Emergency Response Capability  
NUTAC Chairman



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P. Blanch  
Emergency Response Capability  
NUTAC Vice Chairman

RLG:pyc

Attachment

cc: Mr. W.J. Dircks  
Mr. V. Stello  
Dr. D.J. Mattson  
Mr. L.H. Thompson, Jr.  
Mr. D.M. Crutchfield  
Mr. R. Caruso  
Mr. R.P. McDonald  
Mr. W.G. Council  
Mr. F. Rosa  
Mr. E.P. Wilkinson  
Mr. E.L. Zebroski  
ERC NUTAC Utility Points of Contact

## CHARTER

NUCLEAR UTILITY TASK ACTION COMMITTEE  
ON EMERGENCY RESPONSE CAPABILITIES

The Nuclear Utility Task Action Committee (NUTAC) on Emergency Response Capabilities has been established by a group of utility representatives in recognition of the need for industry guidance in implementing Emergency Response capabilities. The principal objectives are to achieve industry consensus on Emergency Response Facility guidelines, Accident Monitoring Instrumentation guidelines, and an evaluation of the man-machine-training-procedures systems. To ensure the working group output is of generic benefit to utilities, membership will be limited to utilities, INPO and EPRI. The chairman and vice chairman will be utility representatives elected by the NUTAC. Staff support will be provided by INPO.

The NUTAC will develop guidelines for the following:

- o Revision to the proposed 10CFR 50.54(f) letter on SECY-82-111,
- o Generic response to the 10CFR 50.54(f) letter on SECY-82-111,
- o Technical criteria and implementation plans for SECY-82-111 issues not covered by other NUTACs,
- o Effective Emergency Response Capabilities Implementation program.
  - Emergency Response Facilities
  - Reg. Guide 1.97
  - Verification & Validation
  - Total Integration

The NUTAC will establish liaison and exchange information with industry groups such as NSSS owners groups, AIF, INPO, and EPRI. Communication on this industry initiative will be maintained with the NRC.

NUCLEAR UTILITY TASK ACTION COMMITTEES  
Charter Supplement

The INPO Board of Directors, on July 13, 1982 authorized INPO to provide staff support for Nuclear Utility Task Action Committees (NUTACs) that are formed and function in accordance with certain criteria, arrangements and conditions as described below:

PREREQUISITES FOR THE FORMATION OF A NUTAC TO BE PROVIDED INPO SUPPORT

The purpose of the NUTAC is to take specific action on a safety and regulatory-related matter.

The matter for action involves potentially costly activities or other major concerns that have similar applicability to virtually all nuclear utilities.

The matter for action requires committee work in the near term that can be completed in less than about 18 months.

Committee actions will not duplicate or replace actions that could be taken by INPO in accordance with its existing functional responsibilities.

It is determined that there is not already in existence another active committee (or group) representing U.S. nuclear utilities with the same objectives, and wherein the committee members and the committee staff support are independent from direct influence or leverage by organizations other than represented U.S. nuclear utilities.

Staff support by INPO would be cost-effective and at least as inexpensive as alternate equivalent support arrangements.

FORMATION OF NUTAC

An IRG recognizes the need for a joint action, ad hoc committee that meets the prerequisites for a NUTAC with staff support by INPO.

The IRG formulates the proposed charter of a NUTAC for which INPO support is requested. The proposed charter includes at least the following:

- a. the specific task action objectives
- b. the scope and priority of actions to be undertaken
- c. attachment of, and commitment to, this document as an integral part of the charter.

The President of INPO must approve the formation of the NUTAC and the draft charter.

The chairman of the recommending IRG sends out invitations to all U.S. utility members of INPO for participation in the NUTAC. Participation by each and all U.S. utility members of INPO is solicited and encouraged. The membership and leadership of a NUTAC is restricted to representatives of U.S. nuclear utilities.

A member of the recommending IRG chairs an organizational meeting at INPO Headquarters. Those representatives attending determine whether or not they desire to form the proposed NUTAC. If so, they select a chairman and work out a more specific charter for that NUTAC. Concurrence of the President of INPO is then obtained for the final charter, as well as any changes thereafter.

#### FUNCTIONING OF NUTAC

The NUTAC proceeds to fulfill its charter with the chairman acting as the spokesman for the NUTAC. It functions as an independent entity recognizing that only commitments made by individual licensees are binding on represented utilities. The chairman signs all finalized documents produced by the committee.

Whether or not a utility member of INPO participates in the NUTAC, it is kept fully informed of committee actions and provided products of INPO-supported committee work.

The NUTAC represents only those utilities which have given their formal approval for such representation whether or not they actively participate in committee activities.

#### TERMINATION OF NUTAC

The NUTAC is terminated upon completion of the action required by its charter or at the end of 18 months, whichever comes first. If its charter is not fulfilled at the end of 18 months, a new NUTAC may be formed in the prescribed manner for completing the work.

#### SUPPORT FOR NUTAC

INPO provides host facilities for NUTAC meetings and staff, technical and secretarial support for the functioning of the NUTAC within available INPO resources.

If additional, specialized support (other than that provided by INPO) is required, the NUTAC will obtain funding by direct solicitation from the utilities represented and will provide for the direction of that support separate from INPO.



SECY 82-111 PLAN OF ACTION

- I. The major elements of SECY 82-111 are:
  1. Development of Plant Specific EOPs
  2. CR Design Review (CRDR)
  3. R.G. 1.97
  4. SPDS
  5. Emergency Response Facilities
  6. Training
  7. Verification of Additions/Modifications, Procedures and Training (V&V)
  
- II. Proposed NUTAC Action Plan

BACKGROUND

- A. Figure 1 shows the integration technique developed by the NUTAC to implement SECY 82-111. As shown in Step 1, fourteen Input Criteria are required to develop the initial evaluation of 5 of the 7 SECY 82-111 elements. An iteration (Step 2) of the elements will be performed in order that the Human Engineering Discrepancies are resolved in the most effective manner (i.e., assurance of adequate operator enhancement and cost). The specifications for development of the basic hardware should be generated

in parallel with the input criteria. These specifications should include adequate flexibility to allow for their prompt and total integration upon finalization of the input criteria. As shown in the figure, the final criteria for the training, SPDS, EOPs, CRDR, and R.G. 1.97 elements are developed as indicated in Step 5. Then the V&V of the training, SPDS, and the EOPs (Step 6) will be performed prior to the development of the final plan which includes the ERF criteria (Step 7).

B. Input criteria for Step 1 will be generated as follows:

1. Generic Guidelines - Owners Groups (currently being developed)
2. Writer's Guide - NUTAC on EOPIA (issued)
3. Task Analysis - NUTAC on MCR Review (currently being developed)
4. Operating Experience - NUTAC on MCR Review develop guidelines for evaluation (in progress)
5. MCR Survey - NUTAC on MCR Review develop guidelines (in progress)

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|-------------------------------|--|
| 6. Human Factors              | - NUTAC on MCR Review develop guidelines (in progress) |
| 7. R.G. 1.97                  | - NUTAC on SECY 82-111 (in progress)                   |
| 8. NUREG 0696                 | - NUTAC on SPDS (issued)                               |
| 9. NUREG 0835                 | - NUTAC on SPDS (issued)                               |
| 10. MCR Design Requirements   | - Original bases documented by utility                 |
| 11. Critical Safety Functions | - Owner's Group and/or utility (in progress)           |
| 12. TSC Criteria              | - NUTAC on SECY 82-111 (in progress)                   |
| 13. OSC Criteria              | - NUTAC on SECY 82-111 (in progress)                   |
| 14. EOF Criteria              | - NUTAC on SECY 82-111 (in progress)                   |

In addition, the Process Criteria will be developed as follows:



15. V&V Program - NUTAC on SECY 82-111  
(in progress)
16. Implementation Plan - NUTAC on SECY 82-111  
(Describing total (in progress)  
integration/iteration  
of all Input and  
Process Criteria)

PLAN

The NUTAC on SECY 82-111 Plan of Action provides for the following:

- A. Prepare a generic response to the 50.54(f) letter that may be used by each utility for plant specific submittal which includes:
1. Description of the NUTAC efforts to develop a generic plan for the development of Final Implementation Plan. This effort provides INPO NUTAC documents to NRC after which individual utilities may reference such documents, take specific exceptions to portions of the documents, and/or provide a total utility specific response.

2. Provide a schedule for each of the NUTAC deliverables (Items II.B 2 through 9 and II.B 12 through 16) and work with the Owner's Group in order to obtain a schedule for Items II.3 1 and 11. In addition to the schedule for each item provide a brief description of the scope of each Input and Process Criterion and typical durations to perform/implement and Input and Process Criterion.

B. Utilizing the NUTAC information provided above, each utility would then be requested to provide on a plant specific basis:

1. Description of the current status of the basic SECY 82-111 elements.
2. Preliminary schedule for implementing the basic SECY 82-111 elements.

NOTE: While the brief description of the content and scope of each deliverable (i.e., guide, method of implementation, etc.) and typical duration for implementation may be sufficient for development of preliminary implementation schedule, it should be recognized that the formalization of the implementation schedule cannot be done until:

- A. Deliverables are finalized and reviewed.
- B. Finalization of purchase specifications.
- C. Review of actual delivery times and construction estimates based on conceptual design.

III. Recommended Modifications to Page 2 Enclosure 2 of SECY 82-111B

To support the NUTAC Action Plan the following revisions are requested:

- A. The time for providing an implementation schedule, now listed as TBD, be 90 days.
- B. The "proposed" schedule be modified to a "preliminary" schedule. Such a schedule could be obtained in a short timeframe based on the plan described above.
- C. The time to reach a final schedule should be reached "expeditiously" vice "as quickly as possible." This will allow for the best preliminary schedule to be monitored by NRC and the utilities with modifications made as the final deliverables are made available and integrated into the plant specific schedules.

