



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

May 27, 1994

Mr. S. LaBruna, Chairman
BWROG Executive Committee
c/o Gulf States Utilities Company
P.O. Box 220
St. Francisville, Louisiana 70775

Dear Mr. LaBruna:

This is in response to your letter of May 3, 1994, in which you requested confirmation of your understanding of the Nuclear Regulatory Commission (NRC) position on several issues related to the Boiling Water Reactor Owners Group (BWROG) accident management (A/M) activities, so that the owners group may proceed to completion according to plan.

We have reviewed the summary of agreements provided in your letter and find that it accurately reflects the NRC views and expectations on these matters. This includes agreements regarding:

- the structure and decision criteria for the two severe accident related methodologies proposed by the BWROG -- for flexible assignment of A/M strategies, and for prioritizing training related to A/M;
- the staff's intent to work with the BWROG and industry on methodology implementation details, and on dealing with the plant-to-plant variability that may result through application of the methods;
- the BWROG beginning to implement the methods without waiting for completion of A/M-related EPG changes. This would effectively permit the guidance and responsibility for certain actions presently in the EOPs to be reassigned to the Technical Support Center staff, subject to meeting the decision criteria in the methodologies.

One point discussed at the April 14, 1994, BWROG/NRR Management Meeting warrants clarification. Specifically, the staff agrees that the BWROG accident management guidelines (AMGs) can be implemented without a formal EPG Rev 5 submittal. (In this context, AMGs is taken to mean the accident management-related EPG changes, the Technical Support Guideline document, the flexible assignment criteria, the training/requalification prioritization criteria, and the overview document describing the integration of these products.) The AMGs and any associated EPG changes may be implemented in accordance with 10 CFR 50.59. Additionally, we do not intend to issue a safety evaluation report on any part of this body of guidance. We request, however, that the AMGs and key supporting documents be submitted for staff information prior to issuing the documents in final form, and that the BWROG support any needed technical interactions/meetings with the staff on this material. This will help ensure that the staff is familiarized with the BWROG products, and that staff comments and concerns can be addressed in the final documents.

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PT - Bob Pella

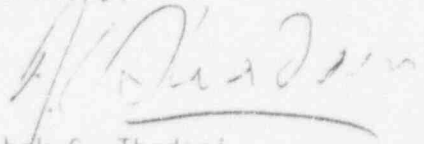
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Mr. S. LaBruna

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I hope that this helps to confirm our understandings on accident management, and look forward to the completion of these activities.

Sincerely,

A handwritten signature in dark ink, appearing to read "Ashok C. Thadani", with a horizontal line underneath the name.

Ashok C. Thadani
Associate Director for Inspection
and Technical Assessment
Office of Nuclear Reactor Regulation