

Approval  
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Date  
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Vogtle Electric Generating Plant  
NUCLEAR OPERATIONS



Georgia Power

Procedure No.  
10013-C

Revision No.  
6

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05-128-90

READ AND DESTROY

WRITING EMERGENCY OPERATING PROCEDURES  
FROM THE WESTINGHOUSE EMERGENCY RESPONSE GUIDELINES

FOR INFORMATION ONLY

1.0 PURPOSE

In conjunction with 10012-C, "EOP And AOP Writers Guide", this procedure will be used to convert Westinghouse Emergency Response Guidelines (ERGs) into Vogtle Emergency Operating Procedures (EOPs).

Revision 1 of the ERGs will be used to generate Revision 0 of the EOPs. As changes to the ERGs are received or as plant operating experience dictates, the EOPs will be updated per this procedure.

2.0 MECHANICS OF CONVERSION

The ERG-to-EOP conversion process consists of the following phases:

- a. Preparation Phase,
- b. Generation Phase,
- c. Documentation Phase.

The Generation and Documentation Phases proceed concurrently.

In this procedure, the word "step" refers to high level action steps, notes, and cautions.

2.1 PREPARATION PHASE

Obtain and review the following information:

- a. Westinghouse ERG-HP, Revision 1 Guidelines and Background Documents for the Revision 0 EOP generation. Thereafter use the latest ERG materials,
- b. 10012-C, "EOP And AOP Writers Guide",

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- c. Final Safety Analysis Report, -
- d. Technical Specifications,
- e. Plant Drawings,
- f. Plant-specific setpoint/value documents,
- g. Licensing Commitments,
- h. Industry or plant operating experience,
- i. EOP validation comments.

This list is the minimum amount of information to be used; other pertinent sources of information should be consulted.

## 2.2 GENERATION PHASE

The ERGs list in generic terms the actions which optimize operator response to emergency conditions in the reference plant. To be used in an operating unit, the ERGs must be made plant-specific to that unit.

The writing of an EOP will be done per these guidelines:

- a. Read the ERG to be converted, and its corresponding background document,
- b. Convert ERG steps to EOP steps by inserting plant-specific information derived from sources as given in Subsection 2.1 of this procedure, and in accordance with 10012-C, "EOP And AOP Writers Guide",
- c. Add, delete, or alter the ERG step as necessary to conform to plant specific documents specified in Subsection 2.1 of this procedure. The intent or purpose of the ERG Background Documents should not be affected by these modifications,
- d. If revising EOPs from a Unit 1 design to a common unit design, applicable Unit 2 documents specified in Subsection 2.1 of this procedure should be reviewed for inclusion into the revision.

## 2.3 DOCUMENTATION PHASE

11894-C, "EOP Step Documentation Form", will be filled out by the EOP writer to give a justification of how he arrived at a given EOP step from the corresponding ERG step.

## 2.3.1 The forms will be used as follows except as noted in Sub-subsection 2.3.2 or unless designated (optional) below:

- a. In "Section I: ERG Step", enter the ERG step which is to be made plant-specific (optional),
- b. In "Section II: EOP Step", enter the EOP step which was generated from the ERG step (optional),
- c. In "Section III: Justification", explain why there are differences (or why there are no differences) between the ERG and EOP steps. Also note the sources of the plant-specific information,
- d. For ERG steps, EOP steps, and associated Justifications that are short in length, the writer will use the documentation form containing all three sections,
- e. For ERG steps, EOP steps, or associated Justifications that exceed the space provided on the form containing all three sections, the writer will use the documentation form for Section I, Section II, or Section III as necessary to present the material,
- f. If the length of the material requires the use of two or more of the documentation forms for individual sections, the writer will include "(Continued)" at the bottom of the first documentation form for the section, and adjacent and to the right of the section heading of subsequent forms.

- 2.3.2 The forms will be used for exceptional cases as follows:
- a. If an ERG step is to be deleted, i.e., not converted to a corresponding EOP step, then enter the ERG step in Section I, enter "Not Applicable to this EOP" in Section II, and justify deletion of the ERG step in Section III, including plant-specific information sources,
  - b. If an EOP step is generated for which there is no ERG step, enter "No corresponding ERG step" in Section I, enter the EOP step in Section II, and provide justification in Section III, including the plant-specific information sources.
- 2.3.3 The completed step documentation forms will be used as source documents to assist in the review, verification, validation, and approval processes.
- When an EOP step must be revised, a new step documentation form will be completed and forwarded to the PRB for review along with the EOP PRRF package. After review the revised step documentation form will be filed immediately preceding any other forms applicable to the step. This may be specified by Operations-Engineering to be in a separate file or within the EOP step documentation package.
- 2.3.4 Step documentation quality shall be in accordance with 00100-C, "Quality Assurance Records Administration", Sub-subsection 4.1.1 at the time of transmitting to Document Control as a QA record.
- 2.3.5 EOP step documentation justifications should be detailed enough so that reviewer can understand why the EOP is different from the ERG step and should reference all sources necessary to justify the change. Revisions to a step document should restate all justification references or state that previous step justification is still applicable. A step document update is considered an addendum of the step documentation.
- 2.3.6 Any reference source document used to justify EOP step differences from ERG steps should be referenced within the justification. Examples of how to use references for justification is included but not limited to the following.
- 2.3.6.1 ERG Feedback items for ERG changes after the most current ERG revision should be referenced if approved and used to justify EOP step.



- 2.3.6.2 Changes to the EOP which are due to Vagale specific terminology should reference 10012-C, "EOP And AOP Writers Guide", if appropriate.
- 2.3.6.3 If the EOP step is identical to the ERG step, then the ERG step should be referenced.
- 2.3.6.4 If the EOP step is only different from the ERG step due to differences in terminology but is still consistent with the intent of the ERG step, then the ERG step and 10012-C, "EOP And AOP Writers Guide" should be referenced.
- 2.3.6.5 If the EOP step was modified to be more consistent with the ERG Background, then the ERG Background for step should be referenced.
- 2.3.6.6 If the EOP step differs from the ERG step due to plant specific differences from the generic plant, then appropriate FSAR references, drawing numbers, or vendor manuals should be referenced.
- 2.3.6.7 If the EOP step differs from the ERG step by having or not having a setpoint for adverse containment conditions, the EOP Setpoint Document should be referenced with explanation.
- 2.3.6.8 A confirmation letter may be used to justify EOP differences from the ERG if directed to the appropriate approving body, i.e., Westinghouse Owners Group (WOG) and Westinghouse for ERG related items, Westinghouse for EOP Setpoint items.
- 2.3.6.9 Step number references changed due to addition or deletion of an EOP step does not require a revised step documentation form.
- 2.3.6.10 Changes to the EOP which alter the information used by the operator to make decisions in performing tasks should be reviewed against task analysis review criteria in 10012-C, "EOP And AOP Writers Guide". This criteria may be used in documenting why an EOP setpoint is used. This criteria should also be used when instrumentation and controls and/or scales used to perform EOP steps have been changed.
- 2.3.6.11 During the Unit 1 to Common unit EOP revision, a newly issued step documentation form for EOP (19xxx-C) documents that an in-depth Unit 1 to Unit 2 comparison has taken place and EOP procedural changes have been made, if necessary.

## 2.4 MAINTENANCE AND REVISION OF EOP REFERENCE MATERIALS

2.4.1 The quality of EOP Reference Materials shall be maintained in accordance with 00100-C, "Quality Assurance Records Administration", Sub-subsection 4.1.1 at the time of transmitting them to Document Control as a Q.A. record.

2.4.2 The following EOP reference materials and revisions thereafter shall be controlled and distributed per 00103-C, "Document Distribution And Control".

2.4.2.1 EOP Setpoint Document manual.

2.4.2.2 ERG Maintenance Program Summary manual.

2.4.2.3 ERG-HP Guidelines manual.

2.4.2.4 ERC-HP Background manuals.

2.4.2.5 ERG Executive manual.

2.4.2.6 PGP manual.

2.4.3 The EOP Setpoint Document manual materials and revisions thereafter shall be transmitted by Westinghouse or be based on approved Westinghouse EOP setpoint documentation for both the controlled and information copies.

2.4.4 The following EOP Reference Materials should always be approved by the WOG and Westinghouse Engineering before use except in those cases where plant specific information overrules the generic issues or used as justification for the EOP step.

2.4.4.1 ERG Maintenance Program Summary manual.

2.4.4.2 ERG-HP Background manual.

2.4.4.3 ERG-HP Guidelines manual.

2.4.4.4 ERG Executive manual.

- 2.4.5 Until an approved copy of revised EOP reference materials is received by Operations Engineering, a telephone confirmation letter may be used for approval. Such documentation revisions should be updated by a single line through the information to be revised, the new information added, revision initialed and dated adjacent to the confirmation letter number. This method shall be used for all EOP reference materials referenced in this procedure.
- 2.4.6 Revised documentation shall be maintained in an information copy of the following EOP Reference Materials to maintain a current approved status of changes until controlled distribution replaces it in the information copy and controlled copy.
- 2.4.6.1 EOP Setpoint Document manual.
- 2.4.6.2 ERG Maintenance Program Summary manual.
- 2.4.6.3 ERG-HP Cuidelines manual.
- 2.4.7 EOP revisions should be kept current with the most current approved reference materials.

### 3.0 REFERENCES

#### 3.1 PROCEDURES

- 3.1.1 10012-C "EOP And AOP Writers Guide"
- 3.1.2 11894-C "EOP Step Documentation Form"
- 3.1.3 00100-C "Quality Assurance Records Administration"
- 3.1.4 00103-C "Document Distribution And Control"

END OF PROCEDURE TEXT