

SEP 21 1984

DISTRIBUTION

DMB 016

Docket File

NRC PDR
L PDR
ORB#4 Rdg
DEisenhut
OELD
EJordan
JNGrace
ACRS-10
RIngram
GGears
Gray File
VDeLiso

Dockets Nos. 50-277
and 50-278

Mr. Edward G. Bauer, Jr.
Vice President and General Counsel
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Dear Mr. Bauer:

SUBJECT: REQUEST FOR THE PROCEDURES GENERATION PACKAGE (SECTION 7,
SUPPLEMENT 1 TO NUREG-0737) FOR PEACH BOTTOM ATOMIC POWER STATION

The staff has reviewed your response to Section 7, "Upgraded Emergency Operating Procedures (EOPs)", of Supplement 1 to NUREG-0737 (Requirements for Emergency Response Capability - Generic Letter 82-33) for Peach Bottom, Units 2 and 3. This response is included in a letter from Philadelphia Electric to the Commission dated April 15, 1983. Although your response included a brief description of the procedures generation program, it did not include a Procedures Generation Package (PGP). Supplement 1 of NUREG-0737 requires that licensees submit a PGP consisting of:

- (1) Plant-Specific Technical Guidelines,
- (2) Plant-Specific Writer's Guide,
- (3) Description of the Validation/Verification Program for EOPs, and
- (4) Description of the Training Program for Upgraded EOPs.

In order for us to complete our review of this NUREG-0737 item, we request that you provide the staff with responses to the attached request for additional information. We would request that your responses be submitted to the NRC staff review no later than 45 days from the receipt of this letter.

If you have any questions concerning this request, please contact your NRC Project Manager (G. Gears) at 301-492-8362.

This request affects fewer than ten respondents; therefore, OMB clearance is not required.

Sincerely, *ORIGINAL SIGNED BY
JOHN F. STOLZ*

8410090511 840921
PDR ADOCK 05000277
F PDR

John F. Stolz, Chief
Operating Reactors Branch #4
Division of Licensing

Enclosure: As Stated

cc w/enclosure: See next page

ORB#4:DL
GGears:cf
9/21/84

ORB#4:DL
JStolz
9/21/84

Philadelphia Electric Company

cc w/enclosure(s):

Eugene J. Bradley
Philadelphia Electric Company
Assistant General Counsel
2301 Market Street
Philadelphia, Pennsylvania 19101

Troy B. Conner, Jr.
1747 Pennsylvania Avenue, N.W.
Washington, D. C. 20006

Regional Radiation Representative
EPA Region III
Curtis Building (Sixth Floor)
6th and Walnut Streets
Philadelphia, Pennsylvania 19106

M. J. Cooney, Superintendent
Generation Division - Nuclear
Philadelphia Electric Company
2301 Market Street
Philadelphia, Pennsylvania 19101

Thomas A. Deming, Esq.
Assistant Attorney General
Department of Natural Resources
Annapolis, Maryland 21401

Philadelphia Electric Company
ATTN: Mr. R. Fleishmann
Peach Bottom Atomic
Power Station
Delta, Pennsylvania 17314

Albert R. Steel, Chairman
Board of Supervisors
Peach Bottom Township
R. D. #1
Delta, Pennsylvania 17314

Allen R. Blough
U.S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Peach Bottom Atomic Power Station
P. O. Box 399
Delta, Pennsylvania 17314

Mr. Thomas E. Murley, Regional Administrator
U. S. Nuclear Regulatory Commission, Region I
Office of Inspection and Enforcement
631 Park Avenue
King of Prussia, Pennsylvania 19406

Mr. R. A. Heiss, Coordinator
Pennsylvania State Clearinghouse
Governor's Office of State Planning
and Development
P. O. Box 1323
Harrisburg, Pennsylvania 17120

Thomas M. Gerusky, Director
Bureau of Radiation Protection
Pennsylvania Department of
Environmental Resources
P. O. Box 2063
Harrisburg, Pennsylvania 17120

REQUEST FOR ADDITIONAL INFORMATION

PEACH BOTTOM ATOMIC POWER STATION, UNITS 2 AND 3

The staff has reviewed the Emergency Operating Procedure (EOP) upgrade portion of Philadelphia Electric Company's response to Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability (Generic Letter No. 82-33)," for Peach Bottom Atomic Power Station, Units 2 and 3. The response was submitted by a letter from Shields L. Daltroff to Darrell G. Eisenhut, Director of the Division of Licensing, dated April 15, 1983. We have determined that additional information is required to continue our review of your program for upgrading EOPs.

Supplement 1 to NUREG-0737 requires submittal of a Procedure Generation Package (PGP) consisting of: (1) Plant-Specific Technical Guidelines, (2) Writer's Guide, (3) description of the validation/verification program for EOPs, and (4) description of a program for training operators in the use of upgraded EOPs. Your response briefly discussed the four parts specified for the PGP and provided information summarizing the status and plans for meeting the requirements for upgraded EOPs. However, a PGP was not submitted; therefore, a clear understanding of how plant procedures have been written from the owners group guidelines is not evident. A PGP was submitted for the Limerick Generating Station, Units 1 and 2 on January 19, 1984. The staff found the Limerick PGP material to be generally acceptable. The results of that review and staff comments on the review will be incorporated in a Supplement to the Limerick Safety Evaluation Report, NUREG-0991.

Thus, a PGP for Peach Bottom Atomic Power Station, Units 2 and 3 containing information similar to that provided for the Limerick Station will be required for the staff to continue its review.