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Docket No. 50-302

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Mr. Walter S. Wilgus
Vice President, Nuclear Generation
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& Fuel Management
P. O. Box 14042; M.A.C. H-2
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Dear Mr. Wilgus:

We are currently reviewing your Procedures Generation Package (PGP) for Emergency Operating Procedures (EOPs) submitted by letter from G. R. Westafer to Darrell G. Eisenhut dated March 25, 1983.

The review of the licensee's PGP is being conducted in accordance with Generic Letter 82-33, Supplement 1 to NUREG-0737. NRC approval of the PGP is not necessary for operating reactors prior to implementing upgraded EOPs; however, a pre-implementation review of technical guidelines is required if a licensee is not using approved generic guidelines. This review was based on NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures," the reference document for the EOP upgrade portion of Supplement 1 to NUREG-0737 (Generic Letter 82-33).

Your response to the enclosed Request for Additional Information is necessary to permit completion of our review of the PGP.

Sincerely,

John F. Stolz, Chief
Operating Reactors Branch No. 4
Division of Licensing

Enclosure:
Request for
additional information

cc w/enclosure:
See next page

ORB#4:DL
HSilver;ef
09/26/84

ORB#4:DL
JFStolz
09/28/84

Crystal River Unit No. 3
Florida Power Corporation

50-302

cc w/enclosure(s):

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REQUEST FOR ADDITIONAL INFORMATION
CRYSTAL RIVER UNIT 3

The staff is reviewing the Procedures Generation Package (PGP) submitted by letter from G. R. Westafer to Darrell G. Eisenhut dated March 25, 1983. We have determined that additional information is required to conduct our review of the plant-specific technical guidelines. The writer's guide, validation program and the training program have been reviewed in detail and we request additional information to complete these reviews. The requested information is discussed below. This information may be provided by submitting a revised PGP.

A. PLANT-SPECIFIC TECHNICAL GUIDELINES

1. Justify the adequacy of the Crystal River plant-specific technical guidelines by referencing the NRC-approved B&W guideline, Oconee ATOG, as applicable, and identifying and justifying safety significant differences between the Crystal River plant-specific guidelines and the referenced guidelines. In addition, provide a description of the method used to determine if the differences are safety significant.
2. Describe the process for using the generic guidelines and background documentation to identify the characteristics of needed instrumentation and controls. For the information of this type that is not available from the generic guidelines and background documentation, describe the process to be used to generate required instrumentation and control characteristics. This process can be described in either the PGP or Detailed Control Room Design Review Program Plan with appropriate cross-referencing.

B. WRITER'S GUIDE

The following items were identified during the review of the plant-specific writer's guide (P-SWG). These items should be addressed and the P-SWG revised as needed.

1. The following items are areas that were addressed in the PGP but additional information is necessary to completely address each area.
 - a. The use of enclosures is discussed in Subsections 2.4.12 (page 17 of 50) and Subsection 3.5.5 (page 25 of 50). There should be additional guidance for the writer on whether to include information in the body of the EOP or as an enclosure.

- b. Section 3.3.1 lists various column headings for sections of the procedure. The P-SWG should include a description of what would be used in the "conditions" column, or the sample EOP (EP-290) should include a clear example of what information should be put in that column. The sample EOP, (EP-290) Appendix 2, does not demonstrate the use of the "conditions" column.
 - c. Subsection 3.5.3 "FIGURES" of the P-SWG refers to Appendix 2; however, Appendix 2 contains only a blank space titled "Figure 1" on pages 10 and 14 of 15 and does not contain examples of either "figures" or "flow charts." The P-SWG should include a representative example of a "line figure," and a "flow chart," as a guide to the procedure writers.
 - d. Provisions for operator placekeeping aids are identified in Section 3.6 on page 26 of 50. However, it is not clear how unmarked blank space can facilitate an operator in keeping his place in the procedures. Additional information should be included to clarify how the open space provided in each step, list and tables will be used for placekeeping. This may be addressed by an administrative procedure on the use of the procedures, but it is not clear in the PGP.
 - e. The writer's guide contains a "Constrained Language List" in Appendix 4. The list should be expanded to include the terms, depressurize, align, reduce, cycle, defeat and shut, which are used in the EP-290, the sample EOP. The "Constrained Language List" should be reviewed, possibly by operations personnel, to ensure completeness.
 - f. The review of the abbreviations and acronyms used in EP-290 identified numerous examples that were not on the "Accepted Abbreviations and Acronyms" list, such as MFD, DNB, RCDT, OOS, TBUS, CLAD, REL, PZR, LCO, EFP, and ADUS. The "Accepted Abbreviations and Acronyms" list should be reviewed and expended as needed to include all the abbreviations and acronyms that will be used in the EOPs.
2. The following item is an area that was addressed, but the writer's guide needs some corrections.

Subsection 4.3.2 (page 33 of 50) of the writer's guide specifies that instructions should be written as positive statements; yet, the example EOP (EP-290) in Appendix 2 contains some violations of this rule. For example:

"If RCPS are operating THEN DO NOT trip RCPS." (EP-290 page 3 of 15)

"Start one RCP per loop. Do NOT bypass interlocks." (EP-290 page 8 of 15)

The examples in Appendix 2 should be made consistent with the instructions in the P-SWG or the P-SWG should be revised to describe when negative statements should be used.

3. The following items are areas that should be addressed in the writer's guide.
 - a. The use of EOPs in the control room make the following concerns important enough so that they should be addressed in the P-SWG:
 - (1) EOPs should be structured so that they can be executed by the minimum control room crew as specified in the technical specifications.
 - (2) EOPs should be structured so that they are consistent with pre-established leadership roles and divisions of responsibilities.
 - (3) Action steps should be structured to minimize physical interference between personnel.
 - (4) The EOPs must be distinctly identifiable from other documents.
 - (5) Once obtained, it should be easy for operators to access any procedure or part of a procedure (e.g. labels, tabbing, color coding, etc.).
 - (6) To ensure readability, all reproductions of EOPs should be of comparable quality to the originals.
 - b. When changes occur in plant design, Technical Specifications, Technical Guidelines or plant policy that affect the EOPs, the EOPs should be revised in accordance with the PGP. Instructions to accomplish this objective should be included in the writer's guide or another administrative procedure, as appropriate.

C. VALIDATION/VERIFICATION PROGRAM

The validation program and the Conformance Checklist as described in the PGP contain some of the essential items that should be included in a complete validation/verification program. However, significantly more information is needed to enable the staff to complete its reviews.

1. A description of how the combination of desk-top reviews, simulator exercises and control room walk-throughs will be used to check the technical content and useability of the EOPs. Include a commitment that the full complement of EOPs will be checked including multiple failure (simultaneous and sequential).
2. The validation/verification program should include a description of the criteria that will be used to select the scenarios to be run on a simulator during the process. The criteria should be developed on the basis of what is needed to test the procedures. For the parts of the EOPs that cannot be tested on the simulator, describe the criteria for selecting any additional testing that needs to be conducted by a control room walk-through or a mock-up walk-through.
3. For the validation/verification program, there needs to be an indication of who is involved in each part of the program (e.g. operators, procedure writers, subject matter experts, etc.), and what roles these participants will play in the processes.
4. There needs to be a description of the plan by which correspondence between EOPs and control room instrumentation and controls will be determined. This may be included as part of the Conformance Checklist. (This item is related to item 2 under the plant-specific technical guidelines which addresses the process for determining the needed instrumentation and controls characteristics.)

D. TRAINING PROGRAM

The training program, as it relates to the EOP implementation should be expanded to include sufficient detail to determine that the trainees will be capable of executing the EOPs as individuals and as teams under operational conditions. The response should include the following items:

1. Program goals in addition to those presented on page 1 of the training program should be to (a) give trainees an understanding of the technical bases of the EOPs, and (b) provide trainees with the ability to execute EOPs under operational conditions.

2. A description of the methods for training in areas not covered by simulator exercises. Simulator exercises do not appear to be included as part of the planned training program for the EOPs although mentioned in the Validation Program, and classroom exercises cannot fully replace simulation. Therefore, provisions for simulation in the training program should be included, and an alternative method(s) of training should be described that provide(s) a high level of assurance that the operator can mitigate transients and accidents using the procedures.
3. A commitment that ALL EOPs will be exercised by ALL operators.
4. An indication of the use in training of a wide variety of scenarios, including multiple failures (simultaneous and sequential).