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Southern Nuclear Operating Company
the southern electric system

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Mr. David L. Meyer
Chief, Regulatory Publications Branch
U. S. Nuclear Regulatory Commission
Washington, DC 20555

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USNRC
OFFICE OF ADMINISTRATION

Comments on Draft Report, NUREG-1449
"Shutdown and Low-Power Operation at
Commercial Nuclear Power Plants in the United States"
(57 Federal Register 6748 of February 27, 1992)

Dear Mr. Meyer:

Southern Nuclear Operating Company has reviewed the draft report, NUREG-1449, "Shutdown and Low-Power Operation at Commercial Nuclear Power Plants in the United States," published in the Federal Register on February 27, 1992. In accordance with the request for comments, Southern Nuclear Operating Company provides the following:

- Section 6.3 introduces a concern on the part of the NRC with the working hours of plant personnel during outages and implies that they expect implementation of the NUMARC "Guidelines to Enhance Safety During Shutdown" to result in programs "reducing time that people perform higher risk activities." It is our expectation that the NUMARC guidelines will reduce the time spent performing high risk activities by rescheduling activities for times of reduced risk, not by reducing working hours. If the NRC is expecting working hours to be reduced as the result of the draft NUREG, additional justification is needed, especially in light of the results from the interviews with plant operators conducted by the NRC documented in Section 3.2.2 of the draft.

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- Section 6.12.2 states, "In meeting this requirement as stated in Criterion J of NUREG-0654, the NRC expects each licensee to evacuate nonessential personnel and to account for onsite personnel within 30 minutes of the declaration of an emergency." This statement, left for the readers' interpretation, may not be consistent with the application of Criterion J of NUREG-0654 in an individual site's Emergency Plan. In order to accurately reflect the requirements of Criterion J and preclude misinterpretation of the regulations, the statement should be revised to read as follows:

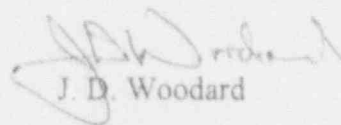
"In meeting this requirement as stated in Criterion J of NUREG-0654, the NRC expects each licensee to (1) evacuate onsite non-essential personnel in the event of a Site or General Emergency and (2) account for all individuals onsite at the time of the emergency in accordance with their approved Emergency Plan."

- Section 7.2.(1) provided a list of items that the NRC felt necessary for achieving effective outage planning and control. Included in the list was a "controlled information system to provide critical safety parameters and equipment status on a real-time basis during the outage." This item is not further defined. It is our concern that the NRC plans to require installation of a system similar to SPDS to provide real-time monitoring of "shutdown critical safety function status trees." The implementation of such a requirement would be costly and offer little safety advantage over current manual methods of safety review utilized to determine if equipment should be removed from service during an outage.

Additionally, the BWR Owners' Group (BWROG), is providing comments on this document which we believe to be appropriate and beneficial.

Should you have any questions, please advise.

Respectfully submitted,


J. D. Woodard

cc: Mr. S. D. Ebnetter
Mr. S. T. Hoffman
Mr. G. F. Maxwell