

Docket No. 50-346

License No. NPF-3

Serial No. 1080

September 10, 1984



RICHARD P. CROUSE
Vice President
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(419) 259-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Operating Reactors
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Your letter dated August 8, 1984 (Log No. 1570), on the subject of Procedures Generation Package (PGP) - Emergency Operation Guidelines, requested that Toledo Edison justify the adequacy of the Davis-Besse plant specific technical guidelines by referencing the Oconee guidelines as applicable and by identifying and justifying safety significance differences between the Davis-Besse guidelines and the Oconee guidelines.

Toledo Edison supports the B&W Owners Group commitment to prepare individual documents addressing the differences between the PGP and the Oconee guidelines directly. The actions required to create this comparison document were initiated at the time the Owners Group made the commitment. Babcock & Wilcox is preparing the comparison document because of their specific involvement in the creation of both the Oconee and Davis-Besse guidelines. Based on the availability of manpower for this special task, we anticipate that the comparison document will be submitted on December 1, 1984.

In addition to the document describing the differences between the Oconee and Davis-Besse guidelines, Toledo Edison will provide a report which will identify and justify any safety significance differences between the Davis-Besse guidelines used to Toledo Edison as a part of the ATOC program and the Emergency Operating Procedures that were developed from those guidelines.

Very truly yours,

RPC:JRL:bec/nlf
cc: Dd-1 NRC Resident Inspector

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