UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SEP 10 1984

Docket Nos.: 50-445/446

Mr. M. D. Spence
President
Texas Utilities Generating Company
400 N. Olive Street
L. B. 81
Dallas, Texas 752[illegible]1

Dear Mr. Spence:

Subject: NRC Staff Supplemental Safety Evaluation Related to Comanche Peak Steam Electric Station Conformance with TMI Action Plan Items I.C.1 and I.C.8 -- Development of Emergency Operating Procedures

Enclosed are the staff's evaluation findings pertaining to Comanche Peak's conformance with the provisions of TMI Action Plan Items I.C.1 and I.C.8, which we propose to incorporate in the next SER supplement.

Since completion of its initial review of the Comanche Peak Emergency Operating Procedures (EOP) development program and Procedures Generation Package (PGP), the staff has received a modification to the PGP by TUGCO letter dated July 6, 1984, and a letter dated June 29, 1984 addressing the use of the Westinghouse Owners Group Emergency Response Guidelines (ERG). In the June 29, 1984 letter, and from informal telephone discussions held with your staff, it was communicated to the staff that some deviations from Revision 1 to the ERG's exist in the Comanche Peak plant-specified technical guidelines. These deviations were subsequently documented in TUGCO letter dated August 24, 1984.

It should be understood that all deviations from the staff's approved technical guidelines must be revised and approved by NRC prior to initial criticality of Unit 1. To date, NRC has approved Revision 0 of the ERG's with comment, and has not yet completed its review of Revision 1 to the ERG's.

Accordingly, as stated on Page 3 of the enclosure, relative to TMI Action Plan Item I.C.1, it is requested that you provide TUGCO's schedule for submitting an analysis and associated documentation for identifying operator information and control needs. Until your schedule is received and the deviations identified to the staff's approved technical guidelines are reviewed and accepted, TMI Action Plan Item I.C.1 will remain an unresolved confirmatory issue in the Comanche Peak SER.

Please advise John Stefano or Spots Burwell when we may expect to receive your response within 5 days after receipt of this letter.

Sincerely,

ORIGINAL SIGNED BY:

B. J. Youngblood, Chief
Licensing Branch No. 1
Division of Licensing

Enclosure: As stated

cc: See next page

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COMANCHE PEAK

SEP 10 1984

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ENCLOSURE 1

SUPPLEMENTAL SAFETY EVALUATION REPORT

COMANCHE PEAK STEAM ELECTRIC STATION UNITS 1 AND 2

I.C.1 GUIDANCE FOR THE EVALUATION AND DEVELOPMENT OF PROCEDURES FOR TRANSIENTS AND ACCIDENTS

In NUREG-0797, "Safety Evaluation Report Related to the Operation of Comanche Peak Steam Electric Station, Units 1 and 2," the NRC staff stated that a review of revised Westinghouse Owners' Group Guidelines and the applicants' program for development of emergency operating procedures would be conducted. The requirements for these reviews are provided in NUREG-0737, "Clarification of TMI Action Plan Requirements," and in Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability (Generic Letter No. 82-33)." with additional guidance provided in NUREG-0899, "Guidelines for the Preparation of Emergency Operating Procedures."

The staff documented its acceptance of Revision 0 of the Westingnouse Owners' Group Emergency Procedure Guidelines (ERGs) in Generic Letter 83-22. The guidelines were found to be acceptable for use in developing the Comanche Peak plant-specific technical guidelines and emergency operating procedures (EOPs). The staff received Revision 1 to the Westinghouse Owners' Group ERG on May 4, 1984, and is currently reviewing this revision.

In a letter dated January 12, 1983, from H. C. Schmidt to B.J. Youngblood, the applicants submitted their Procedures Generation Package (PGP). Based on staff questions provided in a letter dated May 12, 1983 from B. J. Youngblood to R. J. Gary, the applicants submitted a description of the modifications to be made to the PGP in a letter dated August 10, 1983, from H. C. Schmidt to B. J. Youngblood. Further clarification of the staff requirements regarding function and task analysis were provided at a meeting held with the Westinghouse Owners' Group on March 29, 1984. A revised PGP was submitted by the applicants in a letter dated July 6, 1984 from H. C. Schmidt to B. J. Youngblood, that reflected changes to the original PGP, including a change to address the function and task analysis. A list of technical deviations from

Revision 1 of the Westinghouse Owners' Group ERGs was submitted in a letter dated August 24, 1984, from H. C. Schmidt to B. J. Youngblood.

The staff has reviewed the applicants' submittals to evaluate the adequacy of the applicants' program for preparing and revising EOPs. The review consisted of an evaluation of:

1. The applicants' plant-specific technical guidelines, including:

   a. the planned method for developing plant-specific technical guidelines from approved generic technical guidelines.

   b. deviations from the approved generic technical guidelines and their technical justification, and,

   c. a description of the analysis of operator functions and tasks to identify operator information and control needs which serve either as a basis for deriving needed instrumentation and controls, or for evaluating the adequacy of existing instrumentation and controls.

2. The applicants' plant-specific writer's guide, which details the specific methods to be used in preparing and revising EOPs. These methods are to ensure that the EOPs are usable, accurate, complete, readable, convenient to use, and acceptable to control room personnel.

3. The applicants' program for validating and verifying their EOPs to meet the objectives outlined in NUREG-0899.

4. The applicants' program for training operators on the upgraded EOPs.

The applicants' PGP provides reasonable assurance, with the exceptions noted in the following paragraphs, that the resulting EOPs will be based on

approved technical guidelines that address a wide range of multiple and consequential failures, that the EOPs will be acceptable to, and usable by, operators, that the accuracy and usability of the EOPs will be validated and verified, and that the operators will be trained on the EOPs prior to their implementation.

First, the applicants must adequately describe the analysis for identifying operator information and control needs. This analysis identified as function and task analysis, is required by Supplement 1 to NUREG-0737 to support both EOP development and the Detailed Control Room Design Review (DCRDR). Specifically, the NRC staff needs to complete its review and approval of the applicants' description of the process that was, or will be, used to derive the instrumentation and control characteristics from the information contained in the generic guidelines and related background information. In addition, if any information and control needs are met in a manner other than that specified in the Westinghouse Owners' Group ERGs Revision 1, these alternate means must be identified as plant-specific instrument and control deviations from the generic technical guidelines. These instrument and control deviations must be submitted to the NRC for review and approval. Instrument characteristics include: parameter, parameter type, dynamic range, setpoints, resolution/accuracy, speed of response, units, and the need for trending. Control characteristics include: type (discreet or continuous), discreet functions (e.g., on, off, auto), rate, gain, response requirements, transfer functions, and frequency of use. This analysis and associated documentation must be completed on a schedule to be negotiated with the applicants. This schedule is necessary to allow appropriate coordination between the EOP and detailed control room design review aspects of the function and task analysis.

Second, prior to initial criticality of Unit 1, all deviations from NRC approved technical guidelines must be reviewed and approved.

Based on its review, and subject to the previously listed conditions, the NRC staff concludes that the applicants' program for development of EOPs meets the requirements of Section 7 of Supplement 1 to NUREG-0737, and the guidance contained in NUREG-0899. The applicants' EOP development program is therefore acceptable for issuance of a full power license, with the stated conditions.

The staff will report the results of its review on these exceptions in a supplement to this SER.

I.C.8 PILOT MONITORING OF SELECTED EMERGENCY OPERATING PROCEDURES FOR NEAR-TERM OPERATING LICENSE APPLICANTS

In NUREG-0797, "Safety Evaluation Report related to the Operation of Comanche Peak Steam Electric Station, Units 1 and 2," the staff stated that based on the expectation that the applicants would provide a program for developing and implementing Emergency Operating Procedures (EOPs), the staff did not anticipate conducting a pilot monitoring review of selected EOPs. Based on its review of the applicants' Procedures Generation Package (PGP), described in Section 22, Item I.C.1, of this supplement to NUREG-0797, the staff has determined that a pilot monitoring review of selected EOPs is not required for licensing. The staff therefore considers TMI Task Action Plan Item I.C.8 resolved.

ENCLOSURE 2

SALP INPUT

COMANCHE PEAK STEAM ELECTRIC STATIONS UNITS 1 AND 2

A. Functional Areas: The following functional areas are evaluated during the licensing activities associated with TMI Task Action Plan Items I.C.1 and I.C.8.

1. Management Involvement in Assuring Quality

Management representatives were appropriately involved in the development of the emergency operating procedures programs and the resolution of issues identified by the staff. All personnel levels were effectively involved.

Rating: Category 1

2. Approach to Resolution of Technical Issues

The utility staff attempted to understand NRC positions and approached the resolution of issues based on their technical merits, and not solely on meeting NRC needs or comments in order to expedite the licensing process.

Rating: Category 2

3. Responsiveness to NRC Initiatives

The applicant responded to all NRC staff concerns in a timely and accurate manner.

Rating: Category 1

B. There was no basis for evaluation of other functional areas.