

50-354

May 12, 1992

BWR Owners' Group
c/o Public Service Electric and Gas Company
Hope Creek Generating Station
P.O. Box 236, Mail Code N51
Hancocks Ridge, New Jersey 08038

Attention: Robert D. Binz IV, Chairman

SUBJECT: DIFFERENCES BETWEEN THE EMERGENCY OPERATING PROCEDURES
AND THE LICENSING BASIS

The staff has received your request of April 21, 1992, to evaluate the BWR Owners' Group (BWRG) resolution process for determining if applicable emergency operating procedures (EOPs) differ from the procedures and actions specified in the updated final safety analysis reports (UFSAR) for each UFSAR event. We have reviewed your enclosure, the slides from the BWRG Emergency Procedure Guidelines (EPG) Task Force meeting with the staff on September 17, 1991.

The staff understands the process to be as follows: The licensee will initially assess the consequences of apparent EOP/UFSAR differences using UFSAR methodology. If the UFSAR is judged to be more severe than the EOPs, then the UFSAR will be updated. However, if the UFSAR was not bounding, a realistic analysis would be performed to assess the consequences of EOP actions. If the realistic results are less than the UFSAR consequences, the licensee will then notify the U.S. Nuclear Regulatory Commission (NRC) that it analyzed this issue as an unreviewed safety question. If the realistic consequences were greater than the UFSAR consequence, the licensee will take appropriate action, such as revising the EOPs or the licensing basis.

This process is preliminarily acceptable to the NRC staff. However, to reduce the burden on the staff and the licensees, we request that the BWRG coordinate responses for those unresolved safety questions that are generic to the EOPs.

Before granting final acceptance of your process, the NRC will audit the validation results for the Edwin I. Hatch Plant that were completed using your proposed resolution process for assessing the differences between the EOPs and the licensing basis. We will coordinate the schedule for this audit with the licensing project manager for Hatch.

Please contact R. Frahm (301-504-2866) if you have any questions or comments regarding this letter.

Sincerely,

William T. Russell, Associate Director
for Inspection & Technical Assessment
Office of Nuclear Reactor Regulation

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