



Vogtle Project

February 14, 1985

Director of Nuclear Reactor Regulation
Attention: Ms. Elinor G. Adensam, Chief
Licensing Branch #4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D.C. 20555

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NRC DOCKET NUMBERS 50-424 and 50-425
CONSTRUCTION PERMIT NUMBERS CPPR-108 AND CPPR-109
VOGTLE ELECTRIC GENERATING PLANT - UNITS 1 AND 2
DRAFT SER OPEN ITEM 98 PROCEDURE GENERATION PACKAGE

Dear Mr. Denton:

Attached for your review please find five (5) copies of information requested by your staff in our draft SER open item 98 concerning the method for developing VEGP plant specific emergency operating procedures, as noted in the attachment, this information will be contained in the revised procedure generation package scheduled for submittal to the NRC on April 1, 1985.

If your staff requires any additional information, please do not hesitate to contact me.

Sincerely,

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Project Licensing Manager

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ATTACHMENT

Method of Developing Plant-Specific Emergency Operating Procedures (EOPs) From The Generic Guidelines

VEGP Emergency Operating Procedure (EOP) step documentation forms will be prepared for all ERG/EOP steps per procedure 10013-C, "Writing Emergency Operating Procedure From Westinghouse Emergency Response Guidelines". Step documentation forms will document all deviations of plant specific EOP's from the Westinghouse ERG's and will provide justification for the deviations. EOP step documentation forms will be supplied to the NRC shortly after issuance of approved EOP's.

The Emergency Operating Procedure Generation Package will be revised to include the process for using the generic guidelines and background documentation to identify the characteristics of needed instrumentation and controls. This will be done by adding an addendum to the Method section referencing our contract with Westinghouse (PAV-25307) to generate a plant specific setpoint/value calculation document containing all plant specific setpoints and values contained in HP Rev. 1 of the WOG Emergency Response Guidelines.

Safety-significant, plant -specific deviations from the ERG instrumentation and control requirements will be documented using the step documentation forms referenced in 10014-C 'Verification of Emergency Operating Procedures'. Justifications for such deviations will be submitted for staff review.

Writer's Guide

(1)

To provide a mechanism to allow operators to keep their place when using EOPs under stressful conditions, operators will use a mechanical page marker when transitioning to another procedure.

(2) (a)

10012-C 'EOP AND AOP WRITERS GUIDE', Rev. 1 includes the following definitions of 'check' and 'verify' to provide operators with a distinction between the two action verbs.

Check is defined as to perform a comparison with a procedural requirement. Example: "Check if SI can be terminated."

Verify is defined as to observe if an expected characteristic or condition exists. Typically the expectation comes from some previous automatic or operator action. The appropriate contingency, either stated or implied, is to establish the expected condition. Example: "Verify Reactor Trip".

These types of action directive are used where appropriate in the procedures to ensure that equipment responses and operator actions have occurred and are correct.

(2) (b)

Emergency Operating Procedures are already written to provide time restraints where necessary. These time frames are provided within steps, cautions, or notes consistent with ERG useage. Directives to provide these time frames was given in procedure consistency review meetings.

Also to distinguish between steps that should be performed sequentially and independently, the use of letters and bullets are used respectively as indicated in 10012-C.

(2) (c)

Emergency Operating Procedures are written using diagnostic flow format. The operator is directed to sequential steps. If an Action/Expected Response (AER) step cannot be performed ERG rules of useage directs operator to the Response Not Obtained (RNO) step adjacent to it. If the AER or RNO cannot be performed, ERG rules of useage directs operator to the next AER step. Directives in the Emergency Operating Procedures sometimes directs operator to "GO TO" or "RETURN TO" another step or another procedure. If no procedure step is given, ERG rules of useage direct operator to the first step in the procedure. Continuous action steps are implemented by use of such action verbs as Maintain or Control or by use of When/Then statements. Useage of such operator directives is consistent with HP version Rev. 1 ERGs where appropriate.

(3)

00100-C 'QUALITY ASSURANCE RECORDS ADMINISTRATION' provides guidance for assuring that good quality or legibility of EOPs is maintained.

Validation and Verification (V & V) Programs

(1)

The control room walkthrough of each EOP will be performed as part of the control Room Design Review Program. The EOP validation program (on simulator) will validate selected EOPs.

We plan to walkthrough EOPs on simulator prior to validation to facilitate the validation effort.

(2)

The Validation program scenario selection will be based on the following criteria:

- (1) Plant-specific EOP differences from the ERG Rev. 1, HP reference plant.
- (2) The basic ERG set has been validated at similar plants and will not be duplicated, per se, here.
- (3) Plant conditions or events that have been identified as presently a challenge to correct EOP usage or to plant safety as determined by an in-house EOP review process and from other plant's validation programs.

- (4) Scenarios that are requested by the Control Room Design Review Group.
- (5) Sufficient multiple failure scenarios to provide validation of EOP transition points and correct usage.
- (6) Scenarios from nuclear industry events.

(3)

Since one of the criterion for scenario selection is choosing scenarios having multiple failures, this is covered in item (2) above.

(4)

The EOP verification team is made up of a mixture of Westinghouse Electric Corporation and Georgia Power Company Operations Department personnel. The two Westinghouse team members held RO licenses at other Westinghouse PWRs and have extensive operating experience at these plants as well as in the Navy program. Four Georgia Power Company members have a variety of experiences including 9 man-years experience at other operating nuclear plants, half of which was participation in STA related activities. Two Georgia Power members hold SRO certification and one member spent 9 months in SRO observation training at another Westinghouse PWR. One of the Georgia Power members is a Shift Supervisor and the other three are STAs. All Georgia Power members have engineering degrees and plan to continue participation in the operations of Plant Vogtle.

All EOP verification team members are subject matter experts in ERG background and EOP development and have various operations experiences.

The EOP verification team effort is separate from the validation team effort and will have a different team composition as indicated in the EOP Validation Program.

Training Program Description

The EOP training program includes classroom instruction or self study on each EOP on an annual basis but does not necessarily exercise all EOPs on the simulator; however, the Operator training program does include exercising scenarios that transitions the operator through as many EOPs as possible. Performance of these scenarios will require the operator to exercise the major EOPs. Entry into many of the EOPs depends on individual operator performance of the EOPs or on the number of multiple failures programed.

The VEGP Procedure Generation Package will be revised to reflect the information provided in this response and submitted to the NRC by April 1, 1985.