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DUKE POWER

October 7, 1992

U. S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Subject: Catawba Nuclear Station
Docket Nos. 50-413 and 50-414
Emergency Procedure Development Process
NUREG 0737, Supplement 1

In a letter dated July 16, 1992, Catawba responded to the deficiencies identified in Catawba Requalification Examination Report 50-413/92-300. This information was also discussed in a management meeting held with the NRC on July 13, 1992 at Region II in Atlanta. In the July 16, 1992 letter, we committed to upgrade/revise our existing Emergency Operating Procedures as necessary to correct the deficiencies noted in the report and to ensure their usability. In addition, we have committed to completely upgrade all of the Catawba Emergency Operating Procedures (EOPs) to Revision 1B of the Westinghouse Owners Group Emergency Response Guidelines (ERGs). To make these changes, we feel it is necessary to change our EOP development program as described in our response to NUREG-0737, Supplement 1.

Currently, Catawba utilizes Duke Power specific Emergency Procedure Guidelines (EPGs) as the basis for the Catawba EOPs. These EPGs contain NRC approved safety significant deviations from the Westinghouse ERGs. Presently, the Catawba EOP development and revision process ensures that any changes to the EOPs are reviewed to ensure agreement with the EPGs. We plan to eliminate the EPGs when the new set of EOPs are issued since these new EOPs will be based solely on the Westinghouse ERGs with designated deviations.

We are presently revising certain EOPs to address the problems noted in the above mentioned report and those identified during simulator use. As these revisions are made, we are incorporating some of the Westinghouse ERG guidance to improve the procedures and to allow for a smoother transition from the EPG guidance to the Westinghouse ERG guidance. Since we will be deleting the EPGs when we reach the point of changing out the EOPs, we feel that it would no longer be beneficial to continue to update the EPGs as we make these changes.

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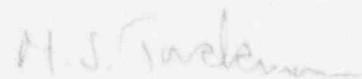
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Therefore, as we revise the existing EOPs and incorporate some of the Westinghouse ERG guidance, we will not revise the associated EPGs. In order to maintain traceability of these deviations from the EPGs, Catawba will maintain appropriate documentation that details how the EOP is different from the EPG. This documentation will be maintained until the EOP change out occurs. At that time, the EPGs and the documentation detailing EPG deviations will be deleted.

In our response to NUREG 0737, Supplement 1, we described the methodology used to convert the Westinghouse ERGs to plant specific procedures. This same process will be used in the future with the exception that the EPGs will no longer be a part of the process. As a result, procedure RS-03, Technical Verification of Nuclear Station Emergency Procedures and Guidelines, which was attached to our response to NUREG 0737, Supplement 1 and described the technical verification process, is no longer valid. Technical verification of the EOPs will still be performed when incorporating ERG guidance, but EPGs will no longer be a part of the process.

In summation, we are revising our EOP development program in that we will no longer revise our EPGs as changes are made to the EOPs during our transition from EPG based to ERG based EOPs. During this transition, we will maintain documentation which details how the EOPs are different from the EPGs. In addition, technical verification of the EOPs will continue to be performed when incorporating Westinghouse ERG guidance, but the EPGs will be removed from this process. Please consider this letter as formal notification of this change to our EOP development program.

Very truly yours,



M. S. Tuckman

RKS/

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