COOPERATIVE . P.O. BOX 817 . 2615 EAST AV SOUTH . LA CROSSE WISCONSIN 54601

(608) 788-4000

March 13, 1985

In reply, please refer to LAC-10629

DOCKET NO. 50-409

Mr. James G. Keppler, Regional Administrator U. S. Nuclear Regulatory Commission Directorate of Regulatory Operations Region III 799 Roosevelt Road Glen Ellyn, IL 60137

SUBJECT: DAIRYLAND POWER COOPERATIVE

LA CROSSE BOILING WATER REACTOR (LACBWR) PROVISIONAL OPERATING LICENSE NO. DPR-45

EMERGENCY PLAN

Dear Mr. Keppler:

In accordance with 10CFR50.54q, Dairyland Power Cooperative proposes the enclosed changes to the LACBWR Emergency Plan. The proposed changes affect Table E-1, which categorizes possible plant conditions into Emergency Action

Four conditions, which were categorized as unusual events, are being eliminated from the table. These are: (1) MSIV failure to close after steam pressure decreases to 900 psig, (2) unanticipated loss of Emergency Diesel Generator when required to be operable, (3) unanticipated loss of Diesel Building DC power supply, and (4) unanticipated loss of ESWSS when required to be operable. The guidance provided in NUREG-0654, Revision 1, does not list any of these conditions, as example unusual events.

The LACBWR Emergency Plan does include as an unusual event: "other plant conditions exist that require plant shutdown under Technical Specifications.' Based on the inclusion of this criteria and that the four conditions are not listed in NUREG-0654, Revision 1, Dairyland Power Cooperative feels these conditions can be removed from the list of Emergency Action Levels without a significant degradation of the plan.

Therefore, Dairyland Power Cooperative requests that the NRC approves the proposed changes. The proposed changes have been reviewed by the LACBWR Operations Review Committee and the Safety Review Committee. The proposed revised pages are attached to this letter.

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Mr. James G. Keppler, Regional Administrator U. S. Nuclear Regulatory Commission Directorate of Regulatory Operations March 13, 1985 Region III LAC-10629 If there are any questions, please contact us. Sincerely yours, DAIRYLAND POWER COOPERATIVE for Frank Linder, General Manager FL:LSG:aes Enclosures CC: Resident Inspector WP1.6.7 - 2 -

|  |  | TABLE E-1<br>(Continued)   | EMERGENCY ACTION LEVEL |                   |                      |
|--|--|--|------------------------|-------------------|----------------------|
| EVENT TYPE   | POSSIBLE INDICATIONS   | POSSIBLE PLANT CONDITIONS  | UNUSUAL<br>EVENT ALERT | SITE<br>EMERGENCY | GENERAL<br>EMERGENCY |
| System/<br>Equipment<br>Failure or<br>Malfunction<br>(Loss of<br>Safety<br>System) | Emergency Core Spray Flow (Lo) Annunciator E14-1 Alternate Core Spray System Lo Flow Annunciator E15-3 | Unanticipated complete loss of ECCS during Operating Conditions 1-3.   | x                      |                   |                      |
|  | Fire Header Water Pressure (Lo) Annunciator B8-4.  | Loss of fire protection system functions requiring shutdown by Technical Specifications.                                 | X                      |                   |                      |
| System/ Equipment Failure or Malfunction (Loss of Contain- ment                    | Airlocks fail Surveillance Test  | Loss of containment integrity<br>during operation such that the<br>Technical Specifications require<br>Reactor Shutdown. | x                      |                   |                      |

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