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SUBJECT: Forwards response to NRC request for addl info re procedures generation package.

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July 29, 1983
G02-83-675

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
PROCEDURES GENERATION PACKAGE FOR WNP-2,
REQUEST FOR ADDITIONAL INFORMATION

The staff review of the WNP-2 Procedures Generation Package resulted in a request for information detailing seven additional questions and one item for information only (three parts). Attached is the WNP-2 response to the staff's review. The item of information is noted and is under consideration for incorporation.

Should you have any further questions please contact Mr. P. L. Powell, Acting Manager, WNP-2 Licensing.

Very truly yours,

Alan Sorensen

G. C. Sorensen, Acting Manager
Nuclear Safety and Regulatory Programs

PLP/tmh
Enclosure

cc: R Auluck - NRC
WS Chin - BPA
A Toth - NRC Site

B001
1/1

640.01 Emergency Operating Procedure Guidelines; the process for developing plant-specific technical guidelines from generic technical guidelines needs to be explained. For this item, the following are the staff information needs:

a. A description of the process used to determine the applicability of the actions specified in the generic technical guidelines to the specific plant. This should be a detailed description of an engineering evaluation or analysis, to the specific operator task level, that evaluates the applicability of the generic technical guidelines to WNP-2.

Supply System Response: Applicability of actions specified by generic technical guidelines was provided by the generic guideline itself. Development of the plant-specific guideline deleted non-applicable statements (references to Isolation Condenser and High Pressure Coolant Injection, for example), substituted plant unique setpoints, design limits, etc. where indicated by the bracketed statements of the generic guideline.

640.01 b. If the process described in item 640.01(a) of this letter identifies any deviations from the generic technical guidelines (because of different plant equipment, operating characteristics, or design), the PGP needs to identify the deviations, describe the analysis performed to determine the safety significance of the deviations, and provide the technical justification (i.e., the analysis) for the plant-specific approach.

Supply System Response: Deviations to the generic technical guideline were:

CAUTION #5: This caution requires reference to specific procedures for determining suppression pool and drywell average temperatures. The WNP-2 design provides an averaging circuit for these parameters and Technical Specifications address input requirements to the averaging circuits. Since direct read-out of pool and drywell temperatures is provided, Caution #5 was not applied in development of procedures.

CAUTION #6: The generic guideline cautioned the operator about possible level instrument error at elevated drywell temperatures. The plant-specific guideline applies this caution to shutdown and upset range level instrumentation whose reference leg vertical runs are in the drywell. WNP-2 safeguards level instrumentation reference leg vertical runs are located outside the drywell and not subject to high temperature and boil-off during LOCA.

CAUTION #24: This caution requires high drywell pressure and low RPV water levels be bypassed; it was inadvertently included when preparing the plant-specific guideline from the BWR Owners' Group material but is not applicable to Revision 2 of the generic guideline.

GUIDELINE STEP DW/T-2: This step requires the RPV be flooded if drywell temperature near the level instrument reference leg vertical runs reaches RPV saturation temperature. While the WNP-2 plant-specific guideline retained this action step, the procedure review process deleted the requirement because safequards level instrumentation reference leg vertical runs are located outside the drywell. The requirement to flood if RPV level cannot be determined (guideline step RC/L-1) is retained.

GUIDELINE STEP CN/T: This section is applicable to the BWR Mark III containment and was deleted from the WNP-2 (Mark II) plant-specific guideline in its entirety.

640.01

c. A description of the process for identifying the information and control system needs of the operators, and a description of the analysis or process used to ensure the availability and adequacy of the instrumentation and controls to meet the identified needs. The GE generic guidelines provide a significant portion of the required analysis. That is they provide a listing of general information (e.g., RPV water level) to use in determining the need for an action, and the tasks that need to be performed for the action. The listing of information is based on existing instrumentation in the General Electric NSSS, and does not in our view go far enough in identifying the need for more effective or accurate indications of the necessary information.

The tasks that need to be performed to complete a given action are available in the generic guidelines at a system or component level. To complete the task analysis, WPPSS should take the information regarding instrumentation and tasks that is provided in the GE generic guidelines, the plant specific equipment operating characteristics, shift manning, and operating philosophy, and determine for WNP-2 whether improved instrumentation (type, range, display format and location) and controls (design and location) are necessary for the tasks identified. Information from the task analysis should be used to determine the adequacy of the parameters, instrumentation and controls for the specific plant needs. The task analysis may identify necessary instrumentation not currently available in the control room. This information can contribute significantly to meeting operator information needs, and thus could contribute significantly to plant safety. The task analysis will provide a sense of the adequacy of the information currently used in the procedures and will provide the basis for the detailed control room design review (DCRDR). The DCRDR will then provide the basis for developing a plan for correcting and improving the information referenced in the guidelines.

In the PGP, provide a description of the analysis that will be performed for WNP-2 and a schedule for its completion. Specifically, for WNP-2, which has undergone a prelicensing control room design review (TMI Action Plan Item I.D.1), the detailed task analysis should be performed on a schedule consistent with Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability." In this case, a clear commitment to complete the task analysis is necessary.

Supply System Response: In accordance with TMI Action Plan Item I.D.1, a detailed task analysis and walkthrough of the WNP-2 plant specific emergency procedures has been performed as a part of the Control Room Design Review Program (CRDR). The BWR Owners' Group prepared a CRDR Program Plan which included task analysis and walkthrough of plant emergency procedures. The Program Plan was submitted to the Human Factors Branch of the NRC on August 25, 1981, and Generic Letter 83-18, dated April 19, 1983, stated that the program plan was an acceptable approach with some clarifications. A BWR Owners' Group Survey Team performed a CRDR of the WNP-2 Control Room in January, 1983. Drafts of the plant specific emergency procedures were available for the survey team to perform the required task analysis and walkthrough. The results of the review were submitted as part of the preliminary CRDR on April 14, 1983. Draft procedures used for the CRDR have been revised to include review findings and required control room hardware changes have been initiated. The report further notes that subsequent reviews of the emergency procedures will be performed where changes to the procedures have occurrred since the January 1983 review. This CRDR report fulfills the specified commitment and is consistent with Supplement 1 to NUREG-0737.

640.02 Plant-Specific Writer's Guide, page 5, Item 4.1; information should be presented so that interruptions in the flow of information are minimal. This section should state that each action step will be wholly contained on a single page.

Supply System Response: Procedures have been drafted to place each action step wholly on a single page. The Plant-Specific Writer's Guide will be revised to reflect this provision.

640.03 Plant-Specific Writer's Guide, page 6, Item 4.3; warnings and cautions should be written so that they can be read completely without interruptions by intervening steps or page turning. Section 4.3 should state that each warning or caution statement will be wholly contained on a single page.

Supply System Response: Procedures have been drafted to place each caution wholly on a single page. The Plant-Specific Writer's Guide will be revised to reflect this provision.

640.04 Plant-Specific Writer's Guide, page 8, Item 4.6; Operators may need to locate a specific section of a procedure or other procedures quickly. The GE generic technical guidelines' structure may cause the operator to flip between several different procedures or sub-sections (e.g., RC/L, RC/P, RC/Q concurrently, to C1, to C4, back to RC/L. A technique should be selected to provide quick identification of these various parts, such as tabbing or colored dividers.

Supply System Response: Procedures have been drafted and organized into a separate binder with tabs separating procedures. The Plant-Specific Writer's Guide will be revised to reflect this provision.

640.05 Plant-Specific Writer's Guide, Section 4; concurrent steps are those that have to be performed at the same time. The EOPs should explicitly indicate which steps or procedures are concurrent so that operators can easily refer to all such steps or procedures. The maximum number of concurrent steps or procedures should not be beyond the capability of the control room staff to perform them. A good method of distinguishing concurrent steps or procedures is to write a "NOTE" prior to these steps or procedures advising the operator that they are to be performed concurrently. Although the GE generic technical guidelines advise the operator of upcoming concurrent steps or procedures, a discussion of this item should be addressed in Section 4.

Supply System Response: Procedures have been drafted with explicit instruction provided for concurrent performance of multiple steps or multiple procedures and for exiting one procedure or entering another. The Plant-Specific Writer's Guide, Section 4 will be revised to address these items and the necessity for keeping concurrent actions within the control room staffs' capability to perform them.

640.06 Training Program; a description of your plan for addressing major and minor revisions to EOPs is needed. Minor revisions are those that are editorial in nature, but may impact the interpretation or meaning of the affected part of the EOP. Major revisions are those that affect the sequence or content of actions. The staff believes that minor revisions can be addressed by the above methods, with consideration for using walkthroughs and simulation to the type of learning taking place.

Supply System Response: Emergency Procedure Training following minor revisions of an emergency procedure is controlled by an in-place administrative procedure wherein operator sign-off is required for the designated reading assignment. Major revisions will be addressed by required reading assignments and one or more of the following methods, dependent on the magnitude of the changes: classroom training, control room walkthrough or simulator exercises.

640.07

Training Program; throughout your training program, an evaluation method will be needed to ensure that operators can demonstrate that they have met each training objective. A description of these evaluation methods should be discussed in this section along with a description of how the evaluation methods will meet the objectives. These methods should be appropriate for the type of learning to be measured. For example, performance on a simulator might best be evaluated by observation using tested performance checklists, and the ability to describe specific aspects of the EOPs or their development could be evaluated by written tests.

Supply System Response: To ensure that the objectives of the Emergency Procedures Training Programs is met, several different types of evaluation methods will be employed by WNP-2 Training.

The particular method of evaluation will vary according to the type of learning to be measured. In the areas of cognitive learning, such as the successful completion of a specific course of classroom instruction or the understanding of a set of Emergency Operating Procedures, written essay and/or objective testing will be used. The license candidates will be measured against an approved standard for the specific question asked.

During the Simulator Refresher Training conducted by GE using non-plant specific simulators (i.e., Brown Ferry & Perry), the WNP-2 Emergency Operating Procedures were used by the license candidates to respond to simulated abnormal and emergency conditions. There was no attempt made to "measure" the candidates performance using these procedures, but GE reported that the license candidates and the procedures were effective in controlling the plant once the candidates had gotten used to them. The Plant Training Manager observed one class using the procedures and was satisfied with the results.