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 50-251 Turkey Point Plant, Unit 4, Florida Power and Light C 05000251
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 WILLIAMS, J.W. Florida Power & Light Co.
 RECIP. NAME RECIPIENT AFFILIATION
 VARGA, S.A. Operating Reactors Branch 1

SUBJECT: Forwards "Procedures Generation Package," in response to
 841205 request for addl info re Item 1.C.1 & Suppl 1 to
 NUREG-0737.

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THE UNITED STATES OF AMERICA
DO hereby certify that

the within and foregoing is a true and correct copy of the original as the same appears in the records of the

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in compliance with the provisions of the Act of March 3, 1879, Chapter 22, Section 1, approved March 3, 1879.

W. S. G. H.

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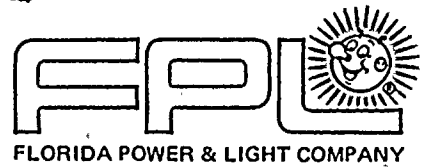
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February 4, 1985
L-85-59

Office of Nuclear Reactor Regulation
Attention: Mr. S. A. Varga, Chief
Operating Reactors Branch #1
Division of Operating Reactors
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Varga:

Re: Turkey Point Units 3 and 4
Docket Nos. 50-250 and 50-251
Supplement 1 to NUREG 0737, Item 1.C.1,
Procedures Generation Package for
Emergency Operating Procedures

By letter dated December 5, 1984, you requested Additional Information on the Procedures Generation Package for Emergency Operating Procedures. Below, please find that additional information:

ITEM 1

If the process used to write plant-specific technical guidelines from generic guidelines results in any deviations from or additions to the generic technical guidelines (because of different plant equipment, operating characteristics or design) the PGP should: 1) either identify all deviations and additions, or describe the evaluation performed to determine the safety significance of the deviations and identify all safety-significant deviations; and 2) provide the technical justification (i.e., engineering evaluation or analysis, as appropriate) for all deviations that are identified to the NRC.

RESPONSE 1

The generation of plant-specific technical guidelines utilizes generic guidelines as outlined in the attached PGP, Section 2.2 (Program Description), Step 2.2.1, 2.2.2 and 3.

The Transition Document referred to in the aforementioned section is designed to detail the information within existing approved plant procedures as to their incorporation within newly formatted plant-specific technical guidelines.

This document will provide identification of plant-specific technical data presently in use and will refine the information transition to the new plant-specific technical guidelines.

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In addition to the Transition Document, the PGP has been revised to include a plant-specific deviation form, which details technical justification for any differences that are generated between plant-specific EOPs and generic guidelines. This method will provide plant-specific deviations and technical justification and has been derived from guidance presented in INPO document 83-007 EOP procedure generation package guideline.

ITEM 2

Describe how the generic guidelines and background documentation were used to identify characteristics of needed instrumentation (e.g., setpoints; speed of response; units) and controls (e.g., discrete vs. continuous controls; response requirements, frequency of use):

- a. If this information is not available from the generic technical guidelines and background documentation, describe the process used to generate this information (e.g., from transient and accident analyses) for identifying instrumentation and control characteristics. This process can be described in either the PGP or in the function and task analysis portion of the Detailed Control Room Design Review Program Plan with appropriate cross-referencing.
- b. For plant-specific deviations from the instrumentation and controls specified in the generic technical guidelines and background documentation, 1) either identify all deviations, or describe the evaluation performed to determine the safety significance of the deviations and identify all safety-significant deviations, and 2) provide a technical justification for each deviation identified to the NRC. These should be submitted in the plant-specific technical guidelines portion of the PGP along with any technical deviations.
- c. For each instrument and control used to implement the EOPs, there should be a description of how the characteristics of the needed instrumentation and controls were determined. These characteristics should be derived from the information and control needs identified in the background documentation of Revision 1 of the ERG or from plant-specific information.

RESPONSE 2

- a. The process used to identify the characteristics of needed instrumentation and controls has been outlined in the Task Analysis Upgrade Program which satisfies the Function and Task Analysis requirements in Supplement 1 to NUREG-0737.

The Westinghouse Rev. 1, Emergency Response Guidelines (ERG) and background documentation will be used as the basis for the Turkey Point plant specific task Analysis of control room operator tasks (ERG steps). From each "ERG Step" all instruments and control requirements will be identified on the Master Information and Control Requirements List as a portion of the detailed Control Room Design Review Program Plan.

Mr. Steven A. Varga

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- b. All instrumentation and control deviations will be identified per response Number One.
- c. This information has been derived from the background documentation provided in the Generic Technical Guidelines and will be supplemented by the Technical Documentation provided in Response Number One.

Should you or your staff have any questions on this information, please contact us.

Very truly yours,

J. W. Williams, Jr.
Group Vice President
Nuclear Energy

JWW/SAV/js

Attachment

cc: J. P. O'Reilly, Region II
Harold F. Reis, Esquire
PNS-LI-85-053-1

