

PUBLIC SERVICE COMPANY OF OKLAHOMA
A CENTRAL AND SOUTH WEST COMPANY

P.O. BOX 201 / TULSA, OKLAHOMA 74102 / (918) 583-3611



Public Service Company of Oklahoma
Black Fox Station
Response to Lessons Learned Report
USNRC Docket Nos. STN 50-556, 50-557

July 27, 1979
File: 6212.125.3500.21L
6212.217.0521.21L

Mr. Steven A. Varga, Assistant Director
Division of Project Management
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20002



Dear Mr. Varga:

The meeting between our respective organizations on July 19 in Bethesda was very productive. We especially appreciated your positive comments concerning our analysis of the lessons to be learned from TMI-2 as they apply to the Construction Permit application for the Black Fox Station. This analysis, which was sent to Mr. Harold R. Denton, Director, Nuclear Reaction Regulation, on June 15, 1979, represented the initial effort by Public Service Company of Oklahoma (PSO) to respond to the events at TMI and documented our long-term corporate commitment to fully analyze every facet of the TMI-2 accident and to incorporate the lessons learned into the design, construction, staffing, training and operation of the Black Fox Station.

With the issuance on July 19 of NUREG-0578, "TMI-2 Lessons Learned Task Force Status Report and Short-Term Recommendations," we compared the 23 lessons learned in that report with the PSO analysis. Our understanding of NUREG-0578 and the comparison of the two documents were greatly facilitated by the helpful explanations and advice offered by you and your staff during our meeting on July 19. These discussions, along with information provided by Mr. Denton during his meeting with our President, Mr. R. O. Newman on July 20, enable us to respond promptly to your request for commitments to the requirements and recommendations of NUREG-0578.

Although our June 15 lessons learned analysis addressed most of the issues discussed in NUREG-0578, the organization of the material is different. Consequently, to facilitate your review, we are reiterating our commitments in a format consistent with the organization of NUREG-0578. In addition to specifically addressing every recommendation and requirement of NUREG-0578, this submittal also addresses matters applicable to Black Fox which were developed by the Bulletins and Orders Task Force, and the Emergency Preparedness group headed by Mr. Brian Grimes.

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CENTRAL AND SOUTH WEST SYSTEM

Central Power and Light
Corpus Christi, Texas

Public Service Company of Oklahoma
Tulsa, Oklahoma

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Shreveport, Louisiana

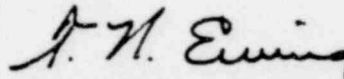
West Texas Utilities
Arlene, Texas

We concur with the view presented during the meetings of July 19 and 20, that all of the commitments and actions required of us by the NRC Staff can be satisfied during the post-construction permit phase of the Black Fox design and construction effort, and that the documentation of these activities should be set forth in the Final Safety Analysis Report for the Black Fox Station. Our commitments reflect this understanding and philosophy.

The TMI-2 accident has stalled progress on the Black Fox application, and as you know, we are quite anxious to overcome this licensing delay. Consequently, we have responded directly and completely to all of the issues applicable to the Black Fox Station as presented by the two Task Forces and Mr. Grimes's group; this submittal should satisfy all of those concerns. In these circumstances, we do believe it reasonable to expect the NRC Staff to complete its report quickly and to respond to the Licensing Board Order of June 13, 1979 in the very near future.

Please call Mr. Vaughn Conrad, Manager, Licensing and Compliance at (918) 583-3611 if you have any questions regarding this submittal.

Sincerely yours,



T. N. Ewing, Manager
Black Fox Station Nuclear Project

TNE:VLC:dm

Attachment

xc: (w/ attachment) BFS Service List

BLACK FOX STATION SERVICE LIST

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PSO Response to the TMI Event has been served on each of the following persons by deposit in the United States mail, first-class postage prepaid, this 27th day of July, 1979.

L. Dow Davis, Esquire
Counsel for NRC Staff
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Mr. Cecil O. Thomas
U. S. Nuclear Regulatory Commission
Phillips Building
7920 Norfolk Avenue
Bethesda, Maryland 20014

Docketing and Service Section
Office of the Secretary of the Comm.
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555
(20 copies)

Mr. William G. Hubacek
U. S. Nuclear Regulatory Commission
Office of Inspection and Enforcement
Region IV
611 Ryan Plaza Drive, Suite 1000
Arlington, Texas 75012

Mr. Gerald F. Diddle
General Manager
Associated Electric Cooperative, Inc.
P. O. Box 754
Springfield, Missouri 65801

Mr. Maynard Human
General Manager
Western Farmers Electric Cooperative
P. O. Box 429
Anadarko, Oklahoma 73005

Michael I. Miller, Esq.
Isham, Lincoln & Beale
One 1st National Plaza
Suite 4200
Chicago, Illinois 60603

Mr. Joseph Gallo
Isham, Lincoln & Beale
1050 17th Street N. W.
Washington, D. C. 20036

Joseph R. Farris, Esquire
Green, Feldman, Hall & Woodard
816 Enterprise Building
Tulsa, Oklahoma 74103

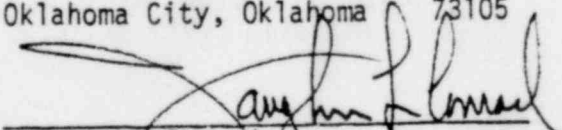
Andrew T. Dalton, Esquire
1437 South Main Street, Suite 302
Tulsa, Oklahoma 74119

Mrs. Ilene H. Younghein
3900 Cashion Place
Oklahoma City, Oklahoma 73112

Mr. Lawrence Burrell
Route L, Box 197
Fairview, Oklahoma 73737

Mrs. Carrie Dickerson
Citizens' Action for Safe Energy, Inc.
P. O. Box 924
Claremore, Oklahoma 74017

Charles S. Rogers, Esq.
Assistant Attorney General
112 State Capitol Building
Oklahoma City, Oklahoma 73105


Vaughn L. Conrad
Manager, Licensing and Compliance
Public Service Company of Oklahoma