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ARTHUR E. LUNDVALL, JR.
VICE PRESIDENT
SUPPLY

November 16, 1981

U.S. Nuclear Regulatory Commission
Office of Nuclear Reactor Regulation
Washington, D.C. 20555

Docket Nos. 50-317
50-318

ATTENTION: Mr. Robert A. Clark, Chief
Operating Reactors Branch #3
Division of Licensing

- REFERENCES:
- a) Letter from D. G. Eisenhower, dated February 25, 1981, on "Emergency Procedures and Training for Station Blackout Events" (Generic Letter 81-04)
 - b) Letter from A. E. Lundvall, Jr., to D. G. Eisenhower, dated May 26, 1981, same subject
 - c) Letter from R. A. Clark to A. E. Lundvall, Jr., dated August 28, 1981, same subject

Gentlemen:

The purpose of this letter is to request schedule relief for the commitments made in reference b). The revised schedule will permit us to efficiently utilize our resources to develop the necessary plant procedures relative to station blackout events. However, more importantly, the revised schedule will not force us to develop plant procedures without the benefit of the guidelines or with guidelines which are still under development. To develop our procedures prematurely will very likely result in training our Operations personnel on new procedures which would be changed again. It is in everyone's best interest to avoid the duplication of effort and the unnecessary hazard created by training Operations personnel, revising procedures, and retraining the same people.

At the time reference b) was submitted to the United States Nuclear Regulatory Commission (NRC), we expected to have Combustion Engineering's station blackout guidelines in hand by September, 1981. As of this writing, we do not have these guidelines, but we do expect to have them by the end of November, 1981. Also, if NRC review of the station blackout guidelines is necessary, as was the case for the emergency procedure guidelines in CEN-152, "Combustion Engineering Emergency Procedure Guidelines", it is unclear when the approved guidelines will finally be available for our use.

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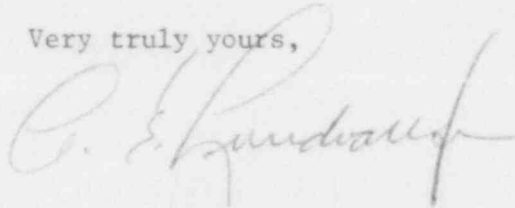
November 16, 1981

The revised schedule commits us to the development of plant procedures relative to station blackouts within three months of receipt of the final version of the guidelines. Following development of revised plant procedures, we will conduct training relative to new and/or revised station blackout procedures within one additional month.

As of this date we have complied with our commitment in reference b) to include natural circulation cooldown using auxiliary feedwater (steam driven) and atmospheric dump valves in our annual requalification training at the simulator.

Should you have any questions regarding this matter, we would be pleased to discuss them with you.

Very truly yours,

A handwritten signature in dark ink, appearing to read "C. E. Lundberg". The signature is fluid and cursive, with a long horizontal stroke at the end.

cc: J. A. Biddison, Esquire
G. F. Trowbridge, Esquire
Mr. D. H. Jaffe
Mr. R. E. Architzel