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May 14, 1982

Re: Docket Nos. 50-277
50-278

Mr. Dariell G. Eisenhut, Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Emergency Operation Procedures for Peach Bottom Atomic
Power Station - Nureg 0737, Item I.C.1

Refs.: See Attachment 1

Dear Mr. Eisenhut:

This letter advises the NRC of our efforts to develop generic BWR emergency procedure guidelines, and of our immediate plans to upgrade the Peach Bottom Units 2 and 3 emergency procedures.

NUREG 0737, Item I.C.1, requires licensees to submit technical guidelines for development of upgraded emergency procedures. Philadelphia Electric Company has actively participated in the BWR Owners' Group program for developing these guidelines since it was initiated in the summer of 1979.

Periodically, the BWR Owners' Group has informed the NRC of its progress (References 1 through 5) on this activity. Relevant information obtained from the utilities writing and validating emergency procedures, and from the NRC staff, was factored into revisions of the guidelines. Additionally, the scope of the guidelines has been expanded to address operator actions for reactivity control. The Owners' Group currently

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plans to submit Revision 2 of the Emergency Procedure Guidelines (EPGs) to the NRC staff for approval in June, 1982.

NUREG 0737 requires licensees to revise and implement their emergency procedures at the first refueling outage after January 1, 1982 following NRC approval of the guidelines. Peach Bottom Unit 2 is currently shutdown for refueling with an expected startup in June, 1982. Consequently, NRC approval of the revised guidelines and procedure implementation by this date is not feasible for Unit 2. Peach Bottom Unit 3 is scheduled for a refueling outage in early 1983. Approval of the guidelines by the NRC staff in a timely manner would be necessary for their incorporation into the Unit 3 procedures prior to the start of the next fuel cycle. Since NRC approval of the guidelines is pending, we propose that it is appropriate to alter the schedule for implementation of the emergency procedures to be the first refueling outage commencing at least six months after NRC approval of the guidelines. We will continue to work with the BWR Owners' Group in their efforts to refine and improve the emergency procedure guidelines.

In the meantime, we have drafted new emergency procedures based on a recent draft of revision 2 of the EPGs. Training of the Peach Bottom operators using these new procedures was started in March, 1982. Our current plan is to implement the new procedures later this year following completion of the operator training. The new procedures will be applicable to both Peach Bottom Unit 2 and Unit 3. We believe the content of Revision 2 of the EPGs permits significant improvements to be incorporated into the Peach Bottom emergency procedures, and that these improvements should be expedited in the interest of enhancing operator response to plant transients and accidents. The procedures will be revised further as needed to reflect the final NRC approved EPGs.

Should you have any questions concerning the above information, please do not hesitate to contact us.

Very truly yours,



- Refs.: 1) Letter, D. B. Waters (BWROG) to D. G. Eisenhower (NRC), "BWR Emergency Procedure Guidelines, Revision 1 and Responses to Related Questions"
- 2) Letter, D. B. Waters (BWROG) to D. G. Eisenhower (NRC), "BWR Emergency Procedure Guidelines, Revision 1, and Responses to Related Questions," dated January 31, 1981
- 3) Letter, T. J. Dente (BWROG) to D. G. Eisenhower (NRC), "BWR Emergency Procedure Guidelines, Revision 1B," dated September 8, 1981
- 4) Letter, T. J. Dente (BWROG) to D. Beckham (NRC/PTRB), "BWR Emergency Procedure Guidelines, Revision 1C," dated December 15, 1981
- 5) Meeting of January 26-27, 1982, between NRC (Procedures and Test Review Branch; Reactor Systems Branch) and BWROG (Emergency Procedures Committee)