



Department of Energy  
Washington, D.C. 20545  
Docket No. 50-537  
HQ:S:82:165

DEC 28 1982

Mr. Paul S. Check, Director  
CRBR Program Office  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Check:

ADDITIONAL INFORMATION REGARDING THE PLANT PROCEDURES AT THE CLINCH RIVER  
BREEDER REACTOR PLANT, PRELIMINARY SAFETY ANALYSIS REPORT (PSAR) SECTION 13.5

In accordance with agreement between our respective staffs, the enclosure is  
submitted to clarify the subject comment. The response will be incorporated  
into PSAR Amendment 75, scheduled for submittal in January 1983.

Any questions regarding this submittal may be directed to A. Meller  
(FTS 626-6355) of the Oak Ridge Project Office staff.

Sincerely,

*J. E. Stader*  
for  
John R. Longenecker  
Acting Director, Office of  
Breeder Demonstration Projects  
Office of Nuclear Energy

Enclosure

cc: Service List  
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ENCLOSURE 1

ITEM: Operations and Maintenance Procedures concerning 1.C.9 of NUREG-718, Rev 2.

RESOLUTION: The attached mark-up of PSAR Section 1.C.9 provides additional information regarding item 1.C.9 of NUREG-718, Rev 2.

### 1.C.9 LONG-TERM PROGRAM PLAN FOR UPGRADING OF PROCEDURES

#### REQUIREMENT:

Applicants shall describe their program plan, which is to begin during construction and follow into operation, for integrating and expanding current efforts to improve plant procedures. The scope of the program shall include emergency procedures, reliability analysis, human factors engineering, crisis management and operator training. Applicants shall also insure that their program will be coordinated, to the extent possible, with INPO and other industry group efforts. Applicants will submit, prior to the issuance of construction permits, a general discussion of how the requirements will be met. Sufficient detail shall be presented to provide reasonable assurance that the requirements will be implemented properly prior to the issuance of operating licenses.

#### APPLICATION TO CRBRP:

This requirement is applicable to CRBRP.

#### IMPLEMENTATION:

CRBRP's program plan to develop plant procedures requires the operator, TVA, to write detailed operating procedures using as a guide procedure outlines developed by designers. The CRBRP design organizations have the responsibility to assure that the design properly considers all aspects affecting safe operability of the plant. In preparing these procedure outlines, the most recent recommendations on upgrading procedures are being considered.

When TVA prepares detailed plant procedures from these outlines the most recent industry recommendations on procedure development will be considered. TVA, as a member of INPO, will use this relationship to maintain an awareness of the 'state-of-the-art' in procedure upgrading and development.

As a followup of "TMI Lessons Learned" an extensive review and update of the CRBRP control room procedure outlines were made. This was accomplished by having a multidisciplinary review team 'walk through' the operating procedure outlines and then upgrade the procedure outlines to reflect the experience gained. The scope of this activity included both normal operating procedures and emergency procedures. Reliability analysis and human factors engineering was a major contribution to this review.

The CRBRP Probabilistic Risk Assessment (PRA) Program will also be utilized to assess procedures and operator interaction. Appendix J, Program Plan for the CRBRP PPA, paragraphs 2.6.1 and 2.6.3 provide additional information on the utilization of Operator Action Event Trees to investigate the role of the plant operation staff in important accident sequences and additional PRA applications to improve understanding of the plant. These PRA applications utilize best estimate analyses. Further, the Project will also evaluate plant safety functions to ensure adequate procedures for events with failure combinations not specifically addressed through the PRA effort.