



Docket No. 50-346

License No. NPF-3

Serial No. 933

April 15, 1983

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Nuclear  
(419) 259-5221

Mr. Darrell G. Eisenhut, Director  
Division of Licensing  
Office of Nuclear Reactor Regulation  
United States Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Eisenhut:

Your letter dated December 17, 1982 (Log No. 1168) requested Toledo Edison to submit schedules for completing each of the basic requirements of Supplement 1 to NUREG-0737 -- Requirements for Emergency Response Capability. We are submitting our response in an attachment for the Davis-Besse Nuclear Power Station Unit No. 1.

Our approach to integrating the work identified in the attachment, with other plant work items, will be covered in our Integrated Living Schedule Program (ILSP). The ILSP and the proposed means of achieving NRC approval will be explained further in a submittal scheduled for late April.

Very truly yours,

RPC:LDY:lah  
attachment

cc: DB-1 NRC Resident Inspector

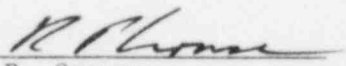
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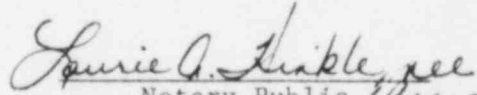
10 CFR 50.54(f)  
SUBMITTAL IN RESPONSE  
FOR  
DAVIS-BESSE NUCLEAR POWER STATION  
UNIT NO. 1  
FACILITY OPERATING LICENSE NO. NPF-3

This letter is submitted in conformance with 10 CFR 50.54(f) in response to Mr. Darrell G. Eisenhut's letter of December 17, 1982 (Log No. 1168). This deals with Supplement 1 to NUREG-0737 -- Requirements for Emergency Response Capability (Generic Letter No. 82-33).

By

  
R. P. Crouse  
Vice-President, Nuclear

Sworn to and subscribed before me this 15<sup>th</sup> day of April, 1983

  
Notary Public (Brudzinski)

LAURIE A. BRUDZINSKI  
Notary Public, State of Ohio  
My Commission Expires May 16, 1986

RESPONSE TO SUPPLEMENT NO. 1 TO NUREG-0737  
REQUIREMENTS FOR EMERGENCY RESPONSE CAPABILITY  
(GENERIC LETTER NO. 82-33)

TOLEDO EDISON COMPANY

DAVIS-BESSE UNIT NO. 1

APRIL 15, 1983

RESPONSE TO SUPPLEMENT NO. 1 TO NUREG-0737  
REQUIREMENTS FOR EMERGENCY RESPONSE CAPABILITY  
(GENERIC LETTER NO. 82-33)

TOLEDO EDISON COMPANY  
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(GENERIC LETTER NO. 82-33)

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1.0 INTRODUCTION

On December 30, 1982 the Toledo Edison Company received NRC Generic Letter 82-33, Supplement 1 to NUREG-0737 - "Requirements for Emergency Response Capability", which provided additional clarification to NUREG-0737 regarding Safety Parameter Display Systems, Detailed Control Room Design Reviews, Regulatory Guide 1.97 (Revision 2), Upgrade of Emergency Operating Procedures, and Emergency Response Facilities. Enclosures to that letter contained a distillation of the basic requirements for each of these topics from the broad range of guidance documents that the NRC has issued (principally NUREG reports and Regulatory Guides).

The purpose of this submittal is to furnish the Toledo Edison Company's (TEDs) schedule for completing each of the basic requirements identified and to provide a description of TED's plans for phased implementation and integration of the emergency response activities as requested in NRC Generic Letter 82-33.

Since the publication of NUREG 0737 "Clarification of TMI Action Plan Requirements" in 1980 TED has been evaluating the Davis-Besse design to address the control room information requirements to enhance operator assistance. Further, various documents published by the NRC since that time, i.e. NUREG 0696 "Functional Criteria for Emergency Response Facilities", NUREG 0814 "Methodology for Evaluation of Emergency Response Facilities", NUREG 0700 "Guidelines for Control Room Design Reviews", NUREG 0835 "Human Factors Acceptance Criteria for SPDS", Commission Memorandum and Order, CLI-80-20 ("Commission Memorandum and Order"), IE Bulletin 79-01B, "Environmental Qualification of Class IE Equipment", and several other pertinent documents were also reviewed. TED had also been actively involved in the industry activities and in particular the INPO groups. As a result of these ongoing activities over the past four years, several plant modifications, particularly with respect to enhancing control room operational aids, have already been incorporated into the Davis-Besse plant design. Now that the NRC has finalized and consolidated the requirements by the issuance of the Generic Letter 82-33, TED intends to review all of the work that has been accomplished and that which is to be completed against these requirements and address all future work in this area as part of the Integrated Living Schedule Program. The concept of ILSP was discussed with members of NRC staff during a presentation on 2/16/83. It is TED's intent to assure that allocation of resources on all new requirements is performed based on a combined evaluation of the safety and operational benefits.

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The information provided in this submittal is organized as follows: Section 2.0 of this submittal describes the coordination and integration of the various initiatives, and includes the overall schedule for completing the emergency response activities highlighting the interrelationships between each of the basic initiatives. This section also includes a description of the plan for phased implementation and integration of the emergency response activities and describes how these activities are integrated with other plant modifications, prior commitments and initiatives. The remaining sections (i.e., Sections 3.0 thru 7.0) provide in greater detail a description of the current status, proposed schedule for completion, and a description of the plans for phased implementation and integration of each of the basic initiatives as follows:

- Section 3.0 - Safety Parameter Display System (SPDS)
- Section 4.0 - Detailed Control Room Design Review (DCRDR)
- Section 5.0 - Regulatory Guide 1.97 - (Rev. 2)
- Section 6.0 - Upgrade Emergency Operating Procedures (EOPs)
- Section 7.0 - Emergency Response Facilities

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2.0 COORDINATION AND INTEGRATION OF INITIATIVES

The objective of Supplement 1 to NUREG-0737 is to establish basic requirements for emergency response capability which will enhance the operator's ability to comprehend plant conditions and cope with emergencies. The accomplishment of this objective requires the implementation of the various initiatives. This section of the submittal describes the coordination and integration of the various initiatives and includes a brief discussion of the current status, the plans for phased implementation and integration of emergency response activities and a proposed schedule for completing each of the basic requirements.

2.1 Current Status

During the past four years since the Three Mile Island accident, the NRC has issued various publications addressing emergency response capability. The Toledo Edison Company recognized the importance of these activities relative to enhancing public health and safety and made upgrading the emergency response capability at Davis-Besse one of its highest priorities even though final NRC guidance in these areas was still evolving. The following is a brief description of the status of each of the emergency response capability initiatives. More detailed descriptions are provided in the corresponding sections of this submittal.

o Safety Parameter Display System (SPDS)

TED is in the somewhat unique position of having its Primary SPDS hardware already installed. Operator support display software is currently being developed by TED Technical Services section which has licensed personnel on its staff. They are also responsible for the development of upgraded emergency operating procedures and the conduct of the detailed control room design review. The existing Primary SPDS can provide sufficient information to adequately access plant safety functions and meet SPDS requirements relative to parameter selection. TED believes, however, that the minimum SPDS functions should be supplemented by additional operator support displays. These additional displays will be provided on the Backup SPDS. The Backup SPDS hardware is on site undergoing initial checkout and software development and will be installed in approximately 6-9 months.



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o Detailed Control Room Design Review (DCRDR)

The Davis-Besse control room was designed to meet prevailing licensing requirements and incorporated existing human factors principles for the design of nuclear power plant Control Rooms. During the past six years of operation, control room modifications have been implemented as needed either in response to NRC requirements or to incorporate changes initiated within TED to enhance operator performance. TED plans to undertake a detailed control room design review, which addresses the appropriate guidelines of NUREG-0700, as part of its ongoing activity to enhance control room information and display systems.

o Regulatory Guide 1.97 - (Rev. 2)

TED has already incorporated the guidelines presented in Rev 2 of the Regulatory Guide 1.97 where ever practical as part of its activities to meet the staff requirements for NUREG-0737, CLI-80-20 etc. In addition, TED has recently begun a systematic review of the existing Davis-Besse instrumentation to determine the degree of compliance with the guidelines of Regulatory Guide 1.97 (Rev. 2).

o Upgrade Emergency Operating Procedures

TED has actively participated in the B&W Owners Group development of generic guidelines known as Abnormal Transient Operator Guidelines (ATOG). The ATOG program developed plant specific guidelines for each B&W unit while using a generic methodology and generic analysis where appropriate. TED received the Davis-Besse plant specific guidelines in October of 1982.

The Davis-Besse emergency operating procedures writers guide has been developed based on current INPO guidance. This guide has been incorporated into the station Administrative Procedure which controls the preparation of all station procedures. TED plans to review the writers guide against the current NRC guidelines.

The development of upgraded emergency operating procedures based on the Davis-Besse plant specific ATOG guidelines and the integration of these procedures into the existing emergency procedure network is currently in progress.

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o Emergency Response Facilities

As previously reported in TED's letter entitled "Emergency Response Facilities" 6/1/81, the Davis-Besse Emergency Response Facilities (Technical Support Center (TSC), Emergency Control Center (ECC), and the Operations Support Center (OSC)), are functional. Modifications to the Emergency Response Facilities (ERFs) resulting from changes to the SPDS and Control Room will be made as required.

2.2 Implementation Plan

The design of the Safety Parameter Display System (SPDS), design of instrument displays based on Regulatory Guide 1.97 guidelines, control room design review, development of function oriented emergency operating procedures, and operating staff training will be integrated with respect to the overall enhancement of operator ability to comprehend plant conditions and cope with emergencies.

As discussed in Paragraph 2.1, the Emergency Response Capabilities (ERC) initiatives are in various stages of development. The SPDS, the upgrade of the EOPs, and the Emergency Response Facilities are well along, whereas the detailed control room design review and the Reg. Guide 1.97 review have just begun. TED plans to use the following method for phased implementation and integration of emergency response activities.

o SPDS

The Primary SPDS hardware has already been designed, built and installed in the control room, TSC, and ECC. The Back-up SPDS hardware which will provide additional operator support displays has been designed, built and will be installed in approximately 6-9 months. The present design of the SPDS will be used as input to the detailed control room design review as well as in the preparation of upgraded emergency operating procedures. Following completion of verification and validation efforts and the incorporation of results from the DCRDR and upgraded EOPs, operators will be trained on the complete SPDS.

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o DCRDR

TED will conduct a review of the control room design based on EOP technical guidelines, the SPDS, safety sequence analysis techniques and accepted human factors principles. The results of this review will be applied to:

- (1) Verify SPDS parameter selection, data display, and function
- (2) Review plant-specific EOPs
- (3) Design control room modifications that correct conditions adverse to safety
- (4) Train plant operating staff

o Regulatory Guide 1.97 - (Rev.2)

TED will conduct a systematic review of the existing Davis-Besse instrumentation to determine the degree of compliance with Reg. Guide 1.97 (Rev. 2). The results of this review will be factored into and become part of all the ongoing activities as discussed in Section 2.1.

o Upgrade EOPs

Utilizing the completed EOP guidelines and the existing writers guide, TED is developing plant-specific emergency operating procedures. Input from the SPDS, DCRDR and Reg. Guide 1.97 review will be factored into EOPs as it becomes available. Following the overall verification and validation efforts to assure individual initiatives have been integrated sufficiently to meet the needs of control room operators and emergency response capabilities, operators will be trained on the revised EOPs. This training will be incorporated into the Integrated Training Program.

o ERF's

TED will modify ERF's as required to reflect changes made to SPDS and the Control Room.

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2.3 Proposed Schedule

Figure 2-1, "Integrated Schedule for Completion of Emergency Response Activities" indicates the schedule for completing each of the ERC initiatives, provides submittal and implementation dates required by generic letter No. 82-33 and shows the interrelationships between initiatives. It should be noted that each of the initiatives requires some NRC involvement in the form of a review, approval, audit or issuing an SER. TED submittal and implementation dates are contingent upon the timely completion of NRC activities.

Implementation of all design improvements required by any of the ongoing activities will be scheduled in accordance with the criteria set forth in TED's Integrated Living Schedule Program.

# INTEGRATED SCHEDULE FOR COMPLETION OF EMERGENCY RESPONSE ACTIVITIES

## INITIATIVES A. SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

## B. DETAILED CONTROL ROOM DESIGN REVIEW (DCRDR)

## C. REGULATORY GUIDE 1.97 (REV. 2)

## D. UPGRADE EMERGENCY OPERATING PROCEDURES (EOP'S)

## E. EMERGENCY RESPONSE FACILITIES (ERF'S)

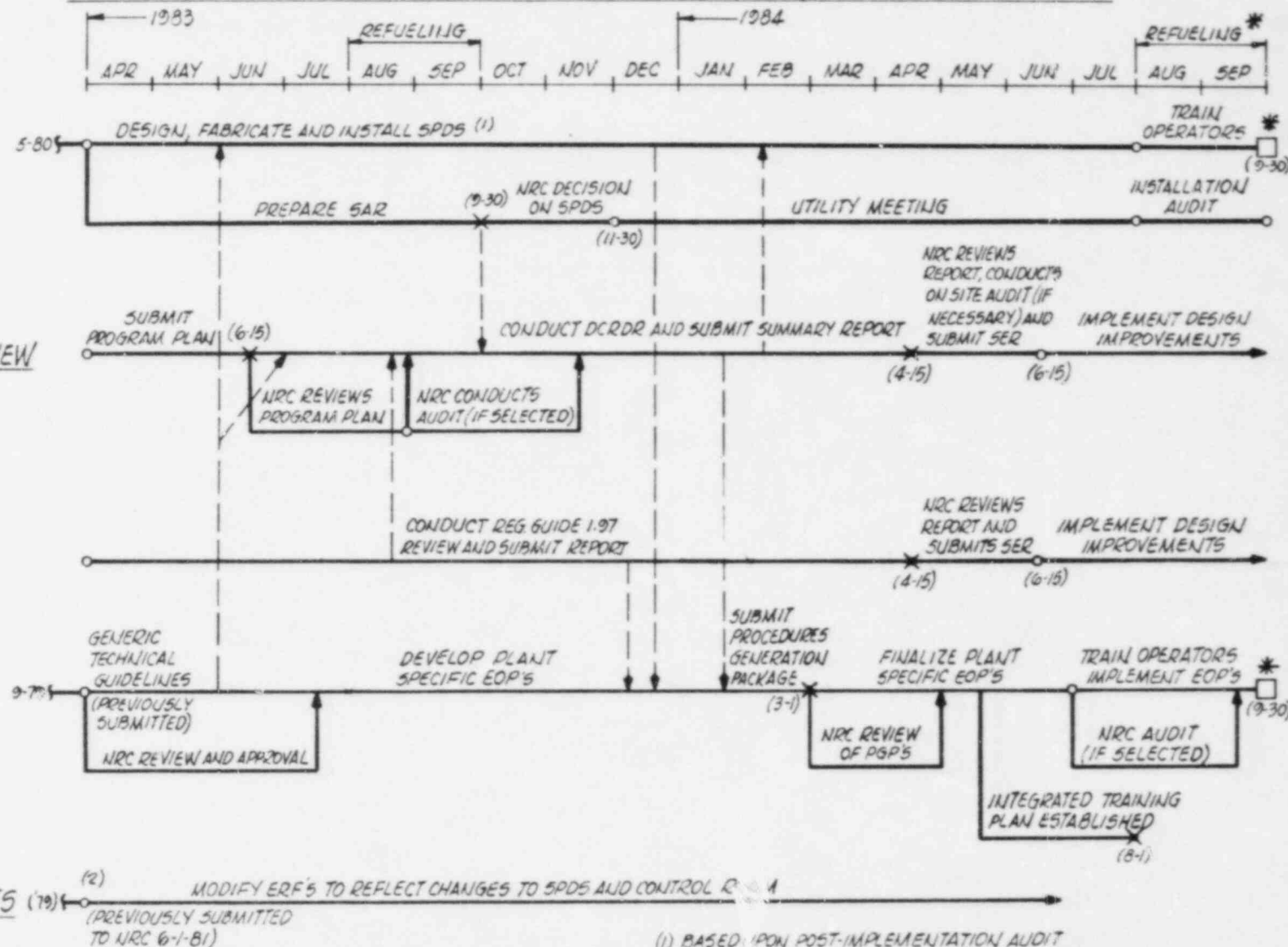


FIGURE 2-1

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3.0 SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

3.1 Current Status

TED recognizes the importance of improving the quality of information available to the plant operator. During the design and development of the emergency response facilities at the Davis-Besse site, special consideration was given to the design of the data acquisition and display system to improve the quality of the information available to the CR operator and to assure that the Technical Support Center (TSC), and the Emergency Control Center (ECC) had access to the plant status information. As the guidelines of NUREG 0696 and 0835 for the design of the SPDS were issued, they were considered in the ongoing development of this new data acquisition and display system. This integrated design development assures that the control room operations personnel and those in the TSC and ECC receive the same information. Consequently, TED is in the somewhat unique position of having hardware already installed for a Safety Parameter Display System (SPDS) in the Control Room which will provide the primary set of displays following the guidelines provided in NUREG-0696.

Based on the experience gained during the initial development, TED has adopted a two step approach to the design and implementation of the SPDS. This is intended to assure maximum involvement by the operators in its design and implementation.

As step one, TED installed a Primary SPDS (see Figure 3-1) which will provide the control room operators, TSC, and ECC personnel a set of primary displays. These displays will consist of the minimum parameter set to monitor the critical safety functions. They were developed based on the utility owner's group recommendations and the experience gained by the Yankee Rowe efforts as documented in NSAC55. The hardware for this system is currently installed in the plant and is operational. The software development is underway. Upon completion of the software development and operator training in the use of the hardware, it will be available to the operator for use on an "information only" basis. As step two, a Backup SPDS (see figure 3-1) will be installed. This Backup SPDS will provide both the primary set of displays available in the Primary SPDS as well as a set of supplementary displays to aid the operators. The Backup SPDS will therefore be redundant to the Primary SPDS, and to a certain extent diverse in that certain data processing and display equipment will be different from that of the primary system. The Backup SPDS hardware is on site and is undergoing testing. It will be installed in the control room during late '83, early '84.

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Operator support display software for both systems is currently being developed by the TED Technical Services section personnel who are also responsible for the development of the upgraded emergency operating procedures and the conduct of the detailed control room design review. The Technical Services section is a part of the station operations organization which includes licensed operators and is thus in an excellent position to insure the proper integration of the SPDS design efforts with the detailed control room design review, emergency operating procedure development, and the integrated training program. Their familiarity with station operations and close ties with operating personnel allows for excellent operator feedback in the development of operator support displays.

Figure 3-1 provides a simplified block diagram of the computer based system which will provide operator support displays in the Control Room and the necessary emergency response information to the Technical Support Center (TSC) and the Emergency Control Center (ECC). The primary display terminal, currently located in the Control Room, is driven by a computer which is located in the Davis-Besse Administration Building. This computer system also supplies information to the TSC and ECC for emergency response activities. It also provides an input to a backup computer which will serve as the driver for the backup display device.

Plant process information is currently available to the primary computer system through two sources. Most important to the SPDS is the multiplexer which transmits approximately 100 key parameters to the primary computer system from which the SPDS parameter set will be chosen. Independent of the multiplexer is the plant process computer which transmits analog and digital information to the primary computer in addition to its normal function of providing operator information in the Control Room.

The backup display device, currently in the TSC for checkout and initial programming, will ultimately be installed in the Control Room and will be driven by its own computer which is currently operating in the TSC.

Information is currently available in the Control Room via the primary display device. This information is available in several formats and includes all the information currently available in the TSC and ECC. Preliminary SPDS displays are at present available in the Control Room on an "information only" basis for the purposes of obtaining operator feedback to the display development.



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3.2 Implementation Plan

TED firmly believes that operator involvement in the development of operator support displays is essential to their acceptance and use by the operator. We, therefore, plan to obtain as much operator input as possible into the preliminary designs of the SPDS displays. When the initial set of Primary SPDS displays is established, a Verification and Validation (V&V) program will be conducted on the Primary SPDS. Operator training will then be conducted before the Primary SPDS will be considered operable. The Primary SPDS will be made available on the existing display device before the backup display unit is installed in the Control Room.

Modifications to this Primary SPDS are expected as a result of operator feedback, the control room design review, the continuing development of the upgraded emergency operating procedures, and the review of Reg. Guide 1.97 requirements. These revisions will be incorporated into the Primary SPDS by an iterative process which will include additional V&V and training activities as the changes are made. When the backup display device is installed in the Control Room, it will provide the same primary display set as those on the Primary SPDS. Any modifications made to those displays considered essential for the minimum SPDS function of identifying safety function status, will be made in parallel on both display units. Additional displays, beyond the requirements of the minimum SPDS, will be developed only on the backup unit.

The most significant training activity on the SPDS displays will take place after the upgraded emergency operating procedures are implemented. Up to that time the training on the system will center around the use of the display devices and on the capabilities and limitations of the display software. When detailed operator training is conducted on the upgraded emergency operating procedures, the use of the SPDS displays in support of those procedures will also be discussed. Following completion of that training, any further modifications to the SPDS will require additional operator training, which not only addresses the modifications to the displays, but how those modifications affect the emergency operating procedures.



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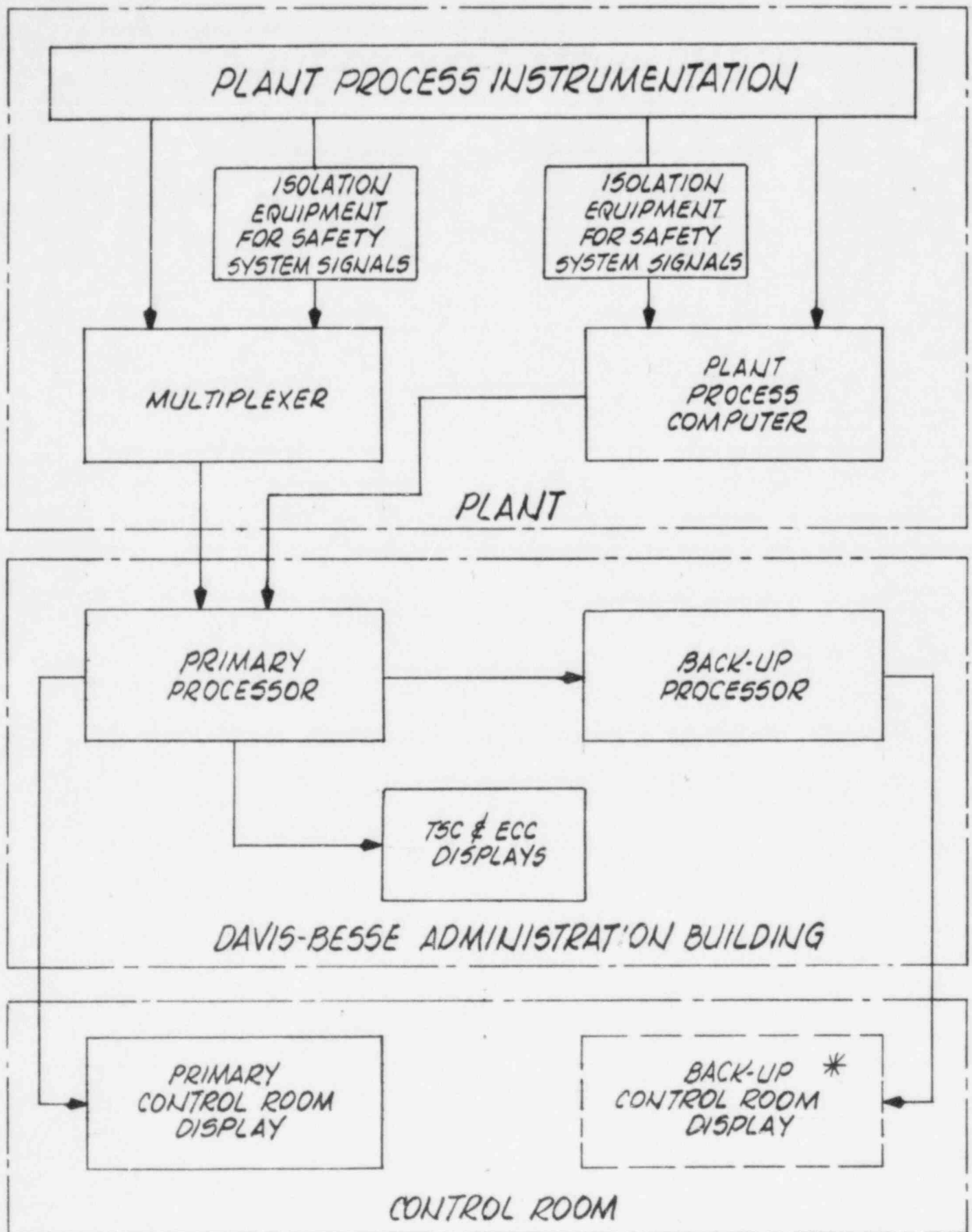
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3.3 Schedule

The safety analysis which will describe the basis for parameter selection and details of the Primary and Backup SPDS as well as the implementation plan will be submitted to the NRC on September 30, 1983. V&V activities and operator training on the Primary SPDS will be complete by November 15, 1983.

The integrated operator training on the upgraded emergency operating procedures and SPDS will be conducted during the 1984 Refueling Outage. Prior to the end of the outage, operator training will be complete, and the SPDS displays will be fully functional on both display terminals in the Control Room.

FIGURE 3-1  
SPDS CONFIGURATION



\* CURRENTLY LOCATED IN TSC FOR CHECKOUT AND PROGRAMMING

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4.0 DETAILED CONTROL ROOM DESIGN REVIEW

4.1 Current Status

The Davis-Besse control room was designed to meet prevailing licensing requirements and incorporated existing human factors principles for the design of nuclear power plant Control Rooms. During the past six years of operation, control room modifications have been implemented as needed either in response to NRC requirements or to incorporate changes initiated within TED to enhance operator performance. TED plans to undertake a detailed control room design review, which addresses the appropriate guidelines of NUREG-0700, as part of its ongoing activity to enhance control room information and display system.

4.2 Implementation Plan

Using the EOP technical guidelines, the SPDS, safety sequence analysis techniques and accepted human factors principles, TED will conduct a detailed review of the control room design. This review will consist of:

- o Establishment of a multidisciplinary review team and review program incorporating accepted human factors engineering (HFE) principles
- o Use of function and task analysis to identify CR operator tasks and information and control requirements during emergency operation
- o Comparison of information displays and control requirements with a control room inventory to identify missing displays and controls
- o Control room survey to identify deviations from accepted HFE principles
- o Review of operating experience and personnel surveys
- o Verification and validation of control room functions
- o Assessment of which discrepancies are significant and should be corrected

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The results of the review will be applied to:

- o Verify SPDS parameter selection, data display and functions
- o Review plant specific EOP's
- o Design control room modifications that correct conditions adverse to safety
- o Train plant operating staff

4.3 Proposed Schedule

The DCRDR Program Plan will be submitted by June 15, 1983. The DCRDR Summary Report will be submitted by April 15, 1984. Implementation of design improvements resulting from the DCRDR will be scheduled in accordance with the criteria set forth in TED's Integrated Living Schedule Program.

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5.0 REGULATORY GUIDE 1.97 - (Rev.2)

5.1 Current Status

TED has already incorporated the guidelines presented in Rev 2 of the Regulatory Guide 1.97 where ever practical as part of its activities to meet the staff requirements for NUREG-0737, CLI-80-20 etc. In addition, TED has recently begun a systematic review of the existing Davis-Besse instrumentation to determine the degree of compliance with the guidelines of Regulatory Guide 1.97 (Rev. 2).

5.2 Implementation Plan

For each of the Emergency Response Facilities (i.e., Control Room, TSC and ECC) the instrumentation requirements will be identified, existing instrumentation will be listed and compared with the requirements to determine the areas of compliance. The results of this review will be documented in a report describing how the requirements are met. The report will include documentation with the following information for each Type A, B, C, D, E variable shown in Regulatory Guide 1.97 (Rev. 2).

- (a) Instrument Range
- (b) Environmental qualification
- (c) Seismic qualification
- (e) Redundancy and sensor(s) location(s)
- (f) Power supply (e.g., Class 1E, non-Class 1E, battery backed)
- (g) Location of display (e.g., Control Room Board, SPDS, Chemical Laboratory)
- (h) Schedule (for installation or upgrade)

Deviations from the guidance in Regulatory Guide 1.97 (Rev. 2) will be shown, and supporting justification or alternatives presented.

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This initiative will be integrated with the DCRDR such that methods utilized during the DCRDR to perform system function reviews and task analysis will also be utilized for identifying TYPE A variables as part of the Reg. Guide 1.97 review. In addition, the results of the Reg. Guide 1.97 review will be factored into ongoing EOP development, the control room inventory portion of the DCRDR and SPDS design.

5.3 Proposed Schedule

The report describing how the requirements of Supplement 1 to NUREG-0737 are met and providing deviations from the Reg. Guide including supporting justifications or alternatives will be submitted on April 15, 1984. Implementation of design improvements resulting from the Reg. Guide review will be scheduled in accordance with the criteria set forth in TED's Integrated Living Schedule Program.

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6.0 UPGRADED EMERGENCY OPERATING PROCEDURES

6.1 Current Status

TED has actively participated in the B&W Owners Group development of generic guidelines known as Abnormal Transient Operator Guidelines or ATOG. The ATOG program developed plant specific guidelines for each B&W unit while using a generic methodology and generic analysis, where appropriate. The pilot plant for the program was ANO-1 of Arkansas Power and Light and draft guidelines from that pilot were submitted to the NRC in August of 1980. Subsequent discussions between the owners group and the NRC resulted in the March 23, 1982 submittal of the guidelines for Oconee Nuclear Station Unit 3 as an improved non-draft version of the document which was to be used as the basis of the Safety Evaluation Report by the NRC.

Additional input has been provided to the NRC in the form of revisions to the Oconee guidelines and numerous meetings between the owners group and the NRC have been held. The Safety Evaluation Report from the NRC exists in draft form, and we are currently awaiting its formal approval and issuance. TED received the Davis-Besse plant specific guidelines in October of 1982.

The Davis-Besse EOP writers guide has been developed based on current INPO guidance. This guide has been incorporated into the station Administrative Procedure which controls the preparation and maintenance of all station procedures. The writers guide was prepared by the TED representative on the INPO Coordinated Emergency Operating Procedures Implementation Assistance (EOPIA) Program Review and Development Group, who is also a member of the B&W Owners Group which prepared the ATOG. The writers guide was based on the experience and guidance of these activities and other guidance documents and with the input from Davis-Besse station personnel.

The development of upgraded emergency operating procedures based on the Davis-Besse plant specific ATOG guidelines and the integration of these procedures into the existing emergency procedure network is currently in progress. This effort is proceeding along two parallel paths. The first consists of the preparation of the symptom oriented emergency procedure based on the guidelines. This procedure is presently in the early stages of development with many details of the mechanics of the integration of this procedure with supporting procedures still to be resolved. The other effort currently underway is the revision of existing emergency procedures which do not interface with the ATOG based procedure. These procedures are being revised in accordance with the Davis-Besse writers guide.

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6.2 Implementation Plan

Concurrent with the ongoing upgrade of the EOP's, the writers guide will be reviewed and revised as required, to assure that the human factors format and style requirements are properly integrated. Using this revised writers guide, upgraded EOP's will be prepared, which will also be subject to human factors review as required during early stages of EOP development.

Following completion of the preparation of the upgraded emergency procedures, a verification and validation (V&V) program will be conducted. This effort will be integrated to the extent possible with the V&V programs of the Control Room Design Review and the Safety Parameter Display System. Deficiencies found during this program will then be corrected, the procedures will be revised, and any additional V&V activities required will be conducted.

Training of the station operators and other appropriate station personnel on the new procedures may then commence and when complete, the transition from the old to the new procedures will be made. The goal of this process will be to minimize as much as possible any negative impact on the operators' response to conditions covered by the new procedures.

The significant changes in the structure of emergency procedures, which will result from this transition, will dictate a significant operator training effort. Due to the extent of operator training required, TED is firmly convinced that the necessary training and an orderly transition to the new procedures can only occur during a scheduled refueling outage. This approach will minimize the confusion inherent in operation with two different sets of emergency procedures and will minimize problems of scheduling operators for extended training classes.

6.3 Schedule

Based on the current status of procedure preparation and the implementation restraints discussed above, TED plans to implement the new emergency operating procedures during the 1984 Refueling Outage. The submittal of the procedures generation package is, consequently, scheduled for March 1, 1984, which is more than three months prior to the expected beginning of the 1984 Refueling Outage and the beginning of operator training.



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7.0 EMERGENCY RESPONSE FACILITIES

The Emergency Response Facilities for the Davis-Besse Nuclear Power Station are completed and operational. A description of each of these facilities is detailed in the attachment to TED's May 27, 1981 letter to Harold R. Denton (Serial No. 719), entitled "Emergency Response Facilities, June 1, 1981".

This previous submittal provides TED's response to the criteria in 10 CFR 50 and Appendix E, as well as NUREG 0696.

The configuration of the Data Acquisition and Display System (Section VI.C of June 1, 1981 submittal), has been modified in the last two years, and will be better represented in this and future submittals related to the Safety Parameter Display System. However, the physical facilities (Technical Support Center, Emergency Operations Facility, i.e., Davis-Besse Emergency Control Center) are as described.

The Central Accident Management philosophy that located these primary facilities adjacent to each other at the boundary of Davis-Besse's owner controlled area is described in Section I of the June 1, 1981 submittal. This location includes the Emergency Operations Facility functions. All these facilities are radiologically habitable to the same criteria as the Davis-Besse Control Room (Section V.D. of the June 1, 1981 submittal), making the use of a backup facility unlikely. However, if required, these functions can be provided with existing facilities, the most distant being TED's Corporate headquarters located 22 miles away. This distance is two miles beyond the guidance most recently provided.

Deviations from NRC guidance are not considered significant and their justification is discussed in detail in the June 1, 1981 submittal. It is requested that concurrence in the adequacy of these facility locations be provided through whatever approval chain is deemed required.