



**PUBLIC
SERVICE
INDIANA**

April 15, 1983
SVP-0054-83

S. W. Shields
Senior Vice President -
Nuclear Division

Mr. Darrell G. Eisenhut, Director
Division of Licensing
Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Docket Nos: STN-546
STN-547
Construction Permit Nos:
CPPR - 170
CPPR - 171

Dear Mr. Eisenhut:

On December 17, 1982, the NRC issued Generic Letter 82-33, "Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability." Pursuant to 50.54(f), Generic Letter 82-33 requests responses from all operating license and construction permit holders, no later than April 15, 1983, providing schedule dates for submittals to NRC and completion of the subject activities.

This letter provides PSI's response to the generic letter, however, the following qualifications are necessary:

Applicability of Generic Letter 82-33 to Marble Hill

As a replicate plant, the generic letter's requirements are applicable to Marble Hill to the same extent that they are applicable to the base plant (Byron). Accordingly, our submittal references this interface where appropriate.

Use of the Enclosed Commitments

Based upon its interpretation of 82-33 and its attachment, NRC commissioner meeting transcripts on the same subject, NRC staff comments at the March 4 Region III meeting and informal communications with the NRC project manager for Marble Hill, PSI understands that NRC will review the enclosed schedule dates. PSI will be glad to meet with NRC to resolve any questions.

It is our understanding that for operating license holders, plant-specific orders will follow incorporating the agreed upon dates. The rationale for this is apparently due to an NRC sense that untimely delay of the subject emergency response capability improvements would be undesirable from a public health and safety standpoint. For OL applicants, PSI understands that orders will not follow; licensing will instead be contingent upon satisfactory resolution of these items.

Boo!

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Use of the Enclosed Commitments (continued)

With this in mind, the dates PSI commits to in this letter were developed to provide a reasonable schedule for submittals and individual item completion dates, commensurate with our overall construction and licensing schedules. Selection of activities for which dates are provided was based on specific NRC requests at the Region III meeting. As has been discussed with NRC's project manager for Marble Hill, technical details are provided in appropriate sections of our FSAR. We will continue to inform NRC if any of the scheduled dates are to be changed.

Sincerely,

A handwritten signature in cursive script, reading 'S. W. Shields'.

S. W. Shields

SWS/RSW/ljl

Attachment

cc: P. O'Connor

I. Plant Safety Parameter Display System (SPDS)

The intent of installing an SPDS is to provide a concise display of critical plant variables to control room operators, to aid them in rapidly and reliably determining the safety status of the plant. Additional technical discussion of the Marble Hill SPDS can be found in Appendix E of the Marble Hill FSAR.

Current SPDS design status: PSI has recently contracted with Westinghouse Electric Corporation for the Marble Hill SPDS. Plant-specific definition of SPDS input parameters is currently ongoing.

Date for submittal of safety analysis: The intent of the referenced safety analysis is to describe the basis by which the selected SPDS parameters are determined to be sufficient to assess the safety status of the plant. This information has been documented for the Westinghouse system within WCAP-9725, WCAP-9725 Supplement 1, and WCAP-10170.

If in the Marble Hill determination of the plant-specific SPDS parameters PSI chooses to deviate from the generic Westinghouse package, a separate safety analysis will be prepared. PSI would transmit this separate safety analysis to NRC no later than March, 1984.

Date when SPDS will be operable and operators trained: The Marble Hill SPDS will be operable and operators trained 5 months prior to Unit 1 Fuel Load (i.e., January, 1986).

Pre-implementation review: PSI does not currently plan to have NRC perform a pre-implementation review of the SPDS. If we decide otherwise, we will appropriately notify NRC.

SPDS schedule interface with other initiatives: Output details and usage criteria for the SPDS are expected to be ready for incorporation in a revision to the Emergency Operating Procedures (EOPs) by December, 1984. The subsequent EOP revision would then be incorporated in the EOP training program.

Development of the SPDS, Control Room Design Review, and Emergency Response Facilities is by nature a parallel activity effort. Accordingly, coordination of these interfaces will be to some extent iterative, just as the remainder of Marble Hill construction, design, and startup includes iteration. We do not anticipate the integration of emergency response capabilities to impact the overall schedule.

II. Detail Control Room Design Review (DCRDR)

The intent of this item is to provide a human factors review of the control room, followed by changes if necessary, to improve the overall capability of operators to prevent or cope with accidents.

Current DCRDR status: PSI is in the process of replicating the results of the Byron Generating Station Human Factors Preliminary Design Assessment including all recommended design changes and performing an assessment of unique systems. However, PSI intends to perform its own DCRDR for Marble Hill, utilizing to the maximum extent practicable the replicate design.

Date for submittal of DCRDR program plan: A DCRDR program plan will be prepared for submittal to NRC by July 15, 1983. The DCRDR will consist of a human factors examination on a full scale mock-up, and will be concluded by June, 1984. Environmental considerations, including lighting and noise levels, will be addressed after the plant has been licensed and is operating.

Date for submittal of summary report: Submittal of the DCRDR summary report is expected to take place by June, 1984. The report will contain a list of all Human Engineering Discrepancies (HEDs) that have not been corrected, with a schedule for resolution.

III. Regulatory Guide 1.97 - Application for Emergency Response Facilities

The intent of Regulatory Guide 1.97 is to provide data to aid in the assessment of plant and environs during and following an accident. The majority of the details of the Reg. Guide 1.97 parameters for Marble Hill will be replicate.

Date for submittal of report describing planned implementation of Reg. Guide 1.97: Since Marble Hill is a replicate to Byron Station, PSI is currently reviewing the Byron Reg. Guide 1.97 details for differences with Marble Hill. Pending the outcome of this review, PSI will transmit to NRC, in July 1983, a schedule for submittal of a Marble Hill-specific report documenting the differences with Byron or indicating that the entire set of Reg. Guide 1.97 parameters/details are replicate.

IV. Upgrade Emergency Operations Procedures (EOPs)

Development of upgraded PSI EOPs has been in progress for approximately two years, resulting from PSI participation in the Westinghouse Owner's Group Procedure Subcommittee. Additional details can be found in Appendix E to the MH FSAR, Sections E.8, E.15, and E.81.

Current status of EOP upgrade: An initial draft of the Marble Hill EOPs and writers guide has been completed. Revision 1 to the Westinghouse Owner's Group generic procedure package is expected to be available later this year, and will be incorporated into the Marble Hill EOPs.

Submittal date for (generic) technical guidelines: This PSI submittal will be based on Westinghouse Owner's Group generic technical guidelines, and is currently scheduled for 17 months prior to Unit 1 Fuel Load (i.e., submittal is currently scheduled for February, 1985).

Submittal date for procedures generation package: This PSI submittal is also scheduled for 17 months prior to Unit 1 Fuel Load (i.e., submittal is currently scheduled for February, 1985).

Date for implementing EOPs: EOP implementation (that is, procedures validated and training on EOPs completed) is scheduled for 5 months prior to Unit 1 Fuel Load (i.e., implementation is currently scheduled for January, 1986).

V. Upgrade Emergency Support Facilities

Emergency support facilities, as included by this item, are the Technical Support Center (TSC), Operational Support Center (OSC), and the Emergency Operations Facility (EOF). Technical details with respect to these facilities can be found in Appendix E to the MH FSAR.

Dates for fully functional* TSC, OSC and EOF: These facilities will be fully functional 5 months prior to Unit 1 Fuel Load (i.e., January, 1986).

*"Fully functional" means all actions concerning structures, instrumentation, procedures, and training have been completed.