



**GULF STATES UTILITIES COMPANY**

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Mr. Harold R. Denton, Director  
Office of Nuclear Reactor Regulation  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Denton:

River Bend Station Units 1 & 2  
Docket Nos. 50-458/50-459

In response to the NRC's letter dated January 18, 1984,  
(A. Schwencer to W. J. Cahill) requesting additional information  
concerning Generic Letter 82-33, "Supplement 1 to NUREG-0737 -  
Requirements for Emergency Response Capability", Gulf States Utilities  
Company (GSU) has prepared the attached supplement to its Emergency  
Operating Procedures Generation Package submittal, dated August 31, 1983  
from J. E. Booker to D. G. Eisenhut.

Sincerely,

*J. E. Booker*

J. E. Booker  
Manager-Engineering  
Nuclear Fuels & Licensing  
River Bend Nuclear Group

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Attachments

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1. A. GSU is a member of the Boiling Water Reactor (BWR) Owner's Group Emergency Procedures Committee (EPC). The BWR Owner's Group EPC has been responsible for the development and documentation of the generic BWR Owner's Group Emergency Procedure Guidelines (EPG-generic technical guidelines). The EPC consisted of representatives from General Electric and experienced personnel from utilities owning BWRs. During development of the EPG's, GSU's EPC representative has provided input to the EPC regarding River Bend Station's (RBS) specific design and operation considerations. In Generic Letter 83-05, "Safety Evaluation of 'Emergency Procedure Guidelines, Revision 2', NEDO-24934, June 1982," the Nuclear Regulatory Commission determined the EPG's to be acceptable for implementation.

The EPGs were reviewed by the appropriate analysts from GE who were cognizant of licensing basis assumptions employed in completing the design basis analysis. In addition, an engineering evaluation of the EPGs is being performed by GSU and will be documented.

The operator reviewing the EPGs for applicability to RBS will have held a reactor operator license. The operator currently evaluating the applicability of the guidelines to RBS is an individual who has been licensed on three BWRs (including a BWR-6) and has written a number of system operating, general operating and abnormal operating procedures for RBS.

The EPGs require inclusion of plant specific information in several places. This plant specific information is being developed and reviewed by the RBS Architect/Engineer (A/E), Stone & Webster.

The process which was used by the BWR Owner's Group to develop the EPGs has assured that the EPGs have been reviewed by design engineers and plant technical engineers acquainted with the plant's capabilities, systems and equipment. These reviews have assured to the maximum extent possible that no conflicts exist between the EPGs and the licensing basis accident analysis.

- B. RBS will prepare a written explanation for each EPG step not included and/or for each EPG step that has been modified to agree with the specific RBS configuration.

The completed Emergency Operating Procedures (EOPs), with the referenced EPGs and written explanations for EPG exceptions will be forwarded to General Electric Company for technical review. This review will be completed at least 90 days prior to fuel load.

Comments from this review will be resolved, in writing and the EOP's will be revised as necessary.

2. The RBS Detailed Control Room Design Review (DCRDR) Program Plan, submitted to the NRC in January 1984, provides a description of the following activities:
  - a) The process for identifying the information and control needs of the operators
  - b) The process used to ensure the availability and adequacy of the instrumentation and controls to meet the identified needs.

A summary of the information stated in that document is indicated below.

#### Task Analysis

The INPO NUTAC DCRDR Task Analysis Guideline will be used as a reference for the task analysis. Operator tasks will be analyzed for selected operating scenarios using the symptom-oriented EOPs and documented on task analysis forms in the following manner:

- a) Discrete steps in the EOP's will be identified in the order of performance.
- b) A brief description of the operator's tasks per procedural step will be recorded.
- c) Instrumentation and/or controls that the operator requires will be identified per procedural step to either: (1) initiate, maintain, or remove from service a system, (2) confirm that an appropriate system response has or has not occurred, i.e., feedback, or (3) make a decision regarding plant or system status.

#### Verification of Task Performance Capabilities

The availability of instrumentation and controls (I&C) that the operator requires will be verified by comparing the task analysis I&C requirements information to the actual main control room. The presence or absence of the required instrumentation and controls will be noted on the task analysis form. Any absences will be treated as Human Engineering Discrepancies (HED's) and will be assessed during the DCRDR process.

An example of the process used to determine the adequacy of the instrumentation and controls that the operator requires is as follows:

If a meter utilized in a particular EOP step exists in the main control room, that particular meter will be examined by the DCRDR review team to determine whether or not it has the appropriate range and scaling to support the operator in the corresponding EOP step. If the range and scaling is appropriate, it will be noted as such on the task analysis form. If the meter range or scaling is not appropriate, it will be noted on the task analysis form and will become an HED.

With regard to specific items in the Authors Guide:

- A. The procedure format provides a place to "check off" steps as they are done.
  - B. The Control Room Operating Foreman will assume the positions of EOP Director/Coordinator. He will evaluate and determine whether the objectives of a step or a sequence of actions has been achieved. He will use his technical knowledge and operator aids, such as GE/ERIS, to make this determination.
  - C. The Author's Guide provides a control and use section to address sequencing requirements.
  - D. Equally acceptable steps are addressed in the two column format and by "branching" both of which are explained in the Author's Guide.
  - E. Concurrent steps are specified in the EOP's, as required to assure mitigation of mechanistically possible conditions.
  - F. Reference 2.1 (ADM 0003) is attached for your information (Attachment 2). Reference 2.2 (OSP 0007) will be provided for your information upon final approval.
  - G. When the procedures are issued, the main control room copy will be tabulated to provide easy operator access.
- 3&4. The RBS EOP Verification and Validation Program Procedure (OSP-0008) will be provided for your information upon final approval. All EOP's will be verified and validated in accordance with this procedure.
5. With regards to the EOP Training Program:
- a. The simulator has the capability of "introducing" approximately 150 different casualties. These casualties will be organized into scenarios that will exercise each EOP during the initial Operator Simulator Training Program.
  - b. The RBS fuel load date is April, 1985. RBS's initial EOP's are the symptom based procedures which meet the intent of NUREG-0737. Operators will be trained on these symptom based procedures.
  - c. The operator's understanding and use of the EOPs will be evaluated and documented during the initial simulator training program as well as requalification training.