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March 14, 1984

Director of Nuclear Reactor Regulation
United States Nuclear Regulatory Commission
Attn: Mr. Steven A. Varga, Chief
Operating Reactors Branch No. 1
Division of Licensing
Washington, DC 20555

Reference: Beaver Valley Power Station, Unit No. 1
Docket No. 50-334, License No. DPR-66
NUREG-0737, Supplement 1: Development of
Emergency Operating Procedures

Gentlemen:

The purpose of this letter is to provide follow-up documentation of a conference call held on February 28, 1984, to discuss the development of plant specific Emergency Operating Procedures (EOPs) from the generic Westinghouse Emergency Response Guidelines (ERGs). The following individuals participated in this conference call:

Peter Tam - NRC Operating Reactors Branch No. 1
Sam Brian - NRC Procedures and Systems Review Branch
William Middleton - NRC Procedures and System Review Branch
Steve Sovick - DLC Licensing and Compliance Section
Don Skidmore - DLC BVPS-2 Operations Group
Curt Mather - DLC BVPS-1 Procedures Group

Draft EOP ES-1.1, SI Termination, was provided as an example of a plant specific procedure developed from the generic guidelines. This procedure was selected because it contained examples of differences from the ERGs in wording, step order, deletion and addition of steps and the addition of notes and cautions.

The Beaver Valley Unit 1 Procedures Generation Package (PGP) was described in part to the extent that it:

1. documents the methodology and logic behind the development of the plant specific EOPs from the generic guidelines.

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2. provides a writers guide developed from the EOPIA document which was referenced in NUREG-0899.

3. requires the identification and documentation of deviations with their justification from the generic Westinghouse guidelines.

4. described verification and validation methods.

The purpose of the conference call was to obtain feedback from the NRC on DLC's methodology for plant specific EOP development and clarification of the phrase "...deviations from generic technical guidelines because of different plant equipment, operating characteristics, or design." (Reference NUREG-0899, Paragraph 2.5.2.b.)

The NRC clarified this phrase by stating that a deviation of this type would be a change in a plant specific technical guideline and emergency operating procedure that changes the overall strategy (significant to safety) delineated by the generic technical guidelines. This type of deviation requires a thorough task and engineering evaluation. Furthermore, a description of these deviations, as well as a description of the method for determining the acceptability of these deviations is a required component of the Procedures Generation Package submittal.

The following deviation types were discussed and were determined to not necessarily cause a change in guideline strategy.

1. Changes in wording to clarify the intent of a step.
2. Changes in step order to accomodate plant design.
3. Deletion of a step to accomodate plant design.
4. Addition of NOTES, CAUTIONS, or STEPS based on existing emergency operating procedures, operator experience, or plant license commitments.

The NRC explained that these deviations, although acceptable without in depth task and engineering evaluation and documentation, should be documented by the utility as a method of ensuring consistent EOP development.

The NRC initiated a discussion of accepted methods of identifying "information and control requirements" when developing plant specific EOPs.

It is DLC's understanding from this discussion that acceptable EOP development can proceed using the following general steps in identifying "information and control requirements."

1. Examine the task, and the "information and control requirements" as determined by the WOG ERGs and background documents.

2. Determine what existing control room instruments or controls are available to satisfy this task.

3. Verify (by physical check) that the instrument, or control is is of adequate range, increment, position, etc., to accomplish the task.

The development of both plant specific EOPs and the procedures generation package will continue based on our understanding of this work as described above. If it is determined that there is a misunderstanding, please advise so that our effort can be completed in a manner consistent with NRC criteria.

If you have any questions concerning this submittal, please contact me.

Very truly yours,

J. J. Carey
Vice President, Nuclear