



**GULF STATES UTILITIES COMPANY**

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G9.33.4

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 - Unit 1  
Docket No. 50-458

This response supplements Gulf States Utilities Company's (GSU) letters dated August 31, 1983 to Mr. D. G. Eisenhower and February 27, 1984 to Mr. H. R. Denton from Mr. J. E. Booker concerning Generic Letter 82-33, "Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability". A recent change in the procedure nomenclature system applied to the RBS Operation Department's procedures replaced procedure number 1-ADM-3-9 with OSP-0009, "Author's Guide/Control and Use of Emergency Operating Procedures (EOP's)". The contents of the procedure remain unchanged with only a change in the procedure number.

Sincerely,

*J. E. Booker*  
for

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

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JEB/ERG/RJK/je

Attachment

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## ATTACHMENT

## Supplemental Response to the RBS Emergency Operating Procedures Generation Package

Section 4.6.4.2 of RBS procedure OSP-0009, "Author's Guide/Control and Use of Emergency Operating Procedures (EOP's)", currently addresses the method of presenting procedural steps for which a number of alternative actions are equally acceptable. There are three methods in which alternative actions are presented in the EOP's.

- 1) In the "Contingency Actions" column.
- 2) By "branching" alternative actions with their corresponding procedure (e.g. "...proceed to AOP-0001).
- 3) Utilize IF/THEN statements with multiple OR statements (e.g. IF - applied when condition exists.  
THEN - applied when performing an action.  
OR - applied with IF/THEN statements when an alternate action is available)

Where EOP steps are performed concurrently with other steps, Section 4.9.2 of OSP-0009 will be revised to include the statement "...and perform concurrently with...". The method of numbering EOP procedure steps is discussed in detail in OSP-0009 Section 4.2, "Format, Organization and Numbering".

Section 4.2.4 will be added to OSP-0009 as follows:

- 4.2.4 To the maximum extent possible, steps should begin and end on the same page. Cautions, notes and informational figures, graphs, or tables will be located on the left page opposite of the page to which it applies (see Section 4.7.1.2).

Scenerios will be developed by using a combination of the EPG Bases, EPG Flow charts (Revision 3) and the River Bend Station EOP's to aid in the training of operators. Scenerios will challenge each EOP. Each scenerio will be pretested and each expected step the operator is to take will be individually identified as a specific task. The pre-identified expected task will then be the basis for comparing the actual performance of the operation personnel during the simulator exercises or main control room walk-throughs. Because of the philosophy of symptom based EOP's, each senario requires multiple and sequential failures to fully exercise a particular procedure.

Training on any revision to an EOP will be accomplished by one or a combination of the following methods

- o Classroom Lecture
- o Simulator Exercise
- o Main Control Room Walk-through
- o Documented Required Reading

Significant revisions will incorporate classroom lecture and either simulator exercise and/or main control room walk-throughs to ensure the operations staff understands the base(s) of the change(s) and is fully competent to perform the actions required by the EOP.