



ARKANSAS POWER & LIGHT COMPANY

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July 17, 1984

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Director of Nuclear Reactor Regulation
ATTN: Mr. James R. Miller, Chief
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Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

Director of Nuclear Reactor Regulation
ATTN: Mr. J. F. Stolz, Chief
Operating Reactors' Branch #4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, DC 20555

SUBJECT: Arkansas Nuclear One - Units 1 & 2
Docket Nos. 50-313 and 50-368
License Nos. DPR-51 and NPF-6
ANO-1&2 Emergency Operating Procedures

Gentlemen:

The following information is provided in response to your letter of May 30, 1984 (ØCNAØ58418) pertaining to Arkansas Nuclear One's Units 1 & 2 Emergency Operating Procedures.

In response to question 1, contained in the attachment to your letter, pertaining to the inclusion in the writer's guide of the specific methods to be used in the writing of the emergency procedure, a comparison was made between the recommendations of NUREG-0899 "Guidance for the Preparation of Emergency Operating Procedures" and AP&L's Emergency Operating Procedure Writing Guidance (Appendix 6C to AP&L's April 15, 1983 submittal on NUREG-0737 Supplement 1) and select ANO administrative procedures dealing with procedure development (1000.05 - Procedure Format & Content; 1000.06 - Procedure Review, Approval, and Revision Control; and 1013.02 - Control of Procedures). From this review the attached comparative checklist was generated. Listed in the left hand column are the applicable portions of NUREG-0899 dealing with the content of a writer's guide. The middle column identifies the ANO administrative procedure and section(s) where the NUREG's recommendations are addressed. The right hand column references applicable sections of the writer's guide where the NUREG's recommendations are addressed. Current revisions of referenced ANO procedures are also

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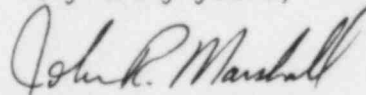
attached. These procedures are subject to change without notice. This comparison was generated in response to further clarification provided on question 1 during telephone conversations with the NRC staff on June 20 and 27, 1984.

With the exception of section 5.6 of NUREG-0899 "Style of Expression and Presentation" the majority of the NUREG's recommendations for a writers guide are addressed in current AP&L documents. Section 5.6 is not fully addressed because, as was stated in our writer's guide, there is no intention that guides for procedure development address all areas inherent in a quality document that accomplishes an objective of efficient communication. For example, there is no guidance that instructs the writer to spell words correctly or to use words whose meaning will be clear to the intended reader, as such items are addressed during the normal review and approval process for each procedure.

Clarification of question 2, which dealt with the use of generic guidelines and background documentation to identify the characteristics of needed instrumentation and controls, was also obtained during the previously mentioned telephone conversations with the NRC staff. During these conversations it was pointed out that a presentation on AP&L's CRDR program, in which the role of the EOP program in the function review and task analysis process of the CRDR program was described, was made to the NRC staff in a meeting held in Bethesda, Maryland on May 2, 1984. A summary of this meeting is contained in Mr. Guy Vissing's letter to AP&L dated June 7, 1984 (OCNA068426). Per our telephone conversation with the NRC staff no additional information is necessary to respond to this question other than that which will be provided in the CRDR summary report submittal.

AP&L's current schedule for the completion of the ANO-2 plant-specific technical guidelines is November 1, 1984. As this date is only two months later than your requested submittal date for the draft guidelines, we believe it would be more productive, to wait until November 1 and submit the final product for your review. This would eliminate a double review within a two month period on your staffs part and of course the final product will be more comprehensive thus reducing the number of areas of uncertainty on your staffs part. However, in the interim we will be available to answer any questions you might have concerning the development or the content of the ANO-2 guidelines. In the interim we would also be available to come to your offices to make a presentation on our ANO-2 specific technical guideline development program. If you believe this would be beneficial for your review please contact us.

Very truly yours,



John R. Marshall
Manager, Licensing

JRM/DEJ/ac

Attachment

ATTACHMENT

<u>NUREG 0899 Section</u>	<u>AND Administrative Procedure/Section</u>	<u>Emergency Operating Procedures Writer's Guide Section</u>
5.2.1	NA - There is only one procedure	
5.2.2	-	1, 5.B
5.2.3	1000.05/6.1.17	-
5.3	-	2
5.4	1000.05/6.1, 6.2.6	6
5.4.1	1000.06/7.3	-
5.4.2	-	6
5.4.3	NA - There is only one procedure	
5.4.4	1000.05/Attachment 4, Section 2	6
5.4.5	1000.05/6.2.6.C.1	-
5.4.6	1000.05/6.2.6.C	6
5.4.7	1000.05/6.2.6.D	6
5.4.8	1000.05/6.1.17	-
5.5	-	2
5.5.1	1013.02/6.1.5, form 1013.02J	-
5.5.2	1013.02/6.1.5	2
5.5.3	1000.05/6.1.9	2
5.5.4	-	5.A
5.5.5	-	-
5.5.6	-	5.B, 5.F
5.5.7	-	6
5.5.8	1000.05/6.1.17	-
5.5.9	NA - Flow charts are not used	
5.6.1	1000.05/6.1.14, 6.1.7	-
5.6.2	1000.05/6.1.7	5.D, 5.E
5.6.3	-	-
5.6.4	-	-
6.5.5	-	-
5.6.6	-	-
5.6.7	-	-
5.6.8	-	-
5.6.9	-	-
5.6.10	-	-