

Docket No. 50-346

License No. NPF-3

Serial No. 1106

November 30, 1984



RICHARD P. CROUSE
Vice President
Nuclear
(419) 259-5221

Director of Nuclear Reactor Regulation
Attention: Mr. John F. Stolz
Operating Reactor Branch No. 4
Division of Licensing
United States Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Stolz:

Attached are two documents intended to support your review of the Toledo Edison Procedure Generation Package. This information was requested by your letter dated August 8, 1984 (Log No. 1570), on the subject of Procedures Generation Package (PGP) - Emergency Operation Guidelines.

Attachment I is a comparison document identifying and justifying safety significant differences between the Davis-Besse Abnormal Transient Operating Guidelines (ATOG) and the Oconee 3 Guidelines which were previously reviewed by the staff. Babcock and Wilcox prepared this document because of their specific involvement in the creation of both sets of guidelines.

Attachment II is a document prepared by Toledo Edison which identifies and justifies safety significant differences between the Davis-Besse ATOG and the Emergency Operating Procedures that were developed from those guidelines. The differences identified in this second attachment are the result of minor inaccuracies in the plant specific detail of the Davis-Besse ATOG, additions to the scope of some portions of the Emergency Operating Procedures, input from the review of the Oconee 3 ATOG by the NRC, and additional experience from B&W Owners Group activity subsequent to the issuance of the Davis-Besse ATOG.

Together, these two documents explain the safety significant differences (and many non-safety significant differences) between the Oconee 3 Guidelines which have been reviewed by your staff and the Emergency Operating Procedures that have been implemented at Davis-Besse.

Very truly yours,

R P Crouse

RPC:JRL:bec/nlf
encl.

cc: DB-1 NRC Resident Inspector

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PDR ADOCK 05000346
F PDR

THE TOLEDO EDISON COMPANY EDISON PLAZA 300 MADISON AVENUE TOLEDO, OHIO 43652

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