



Public Service of New Hampshire

New Hampshire Yankee Division

March 29, 1985

SBN-783

T.F. B7.1.2

United States Nuclear Regulatory Commission  
Washington, DC 20555

Attention: Mr. George W. Knighton, Chief  
Licensing Branch No. 3  
Division of Licensing

- References: (a) Construction Permits CPPR-135 and CPPR-136,  
Docket Nos. 50-443 and 50-444.
- (b) PSNH Letter, SBN-616, dated January 17, 1985,  
"Emergency Operating Procedures Generation Packages",  
J. DeVincentis to G. W. Knighton.
- (c) PSNH Letter, SBN-701, dated July 30, 1984, "Response  
to DCRDR In-progress Audit; NUREG-0737 Item I.D.1",  
J. DeVincentis to G. W. Knighton.
- (d) Westinghouse Owners Group Letter OG-129, dated  
August 14, 1984, "WCAP-10599, Emergency Response  
Guidelines Validation Program, Final Report",  
J. J. Sheppard to H. L. Thompson.
- (e) PSNH Letter, SBN-715, dated September 18, 1984,  
"Emergency Operating Procedures Generation Package",  
J. DeVincentis to G. W. Knighton.

Subject: Emergency Operating Procedures Generation Package

Dear Sir:

On October 11, 1984, Mr. W. Kennedy, NRC-PTRB Reviewer, briefly met with our project representatives in our Bethesda Office to discuss the concerns Mr. Kennedy had regarding the Procedures Generation Package (PGP) documentation which was provided via reference (e). The result of our discussions required us to provide some additional information so that Mr. Kennedy could complete his review.

In order to facilitate the review and closeout of this issue, we are enclosing the following documents:

• PGP Amendments (Attachment A)

1. Writers Guide
2. Plant Specific Guidelines
3. Training

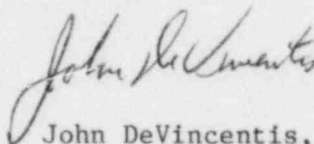
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- Station Operating Procedure 021300 Rev. 00, "Generation of Emergency Response Procedures" (Attachment B)

I hope this additional information will aid in Mr. Kennedy's review and expeditious closeout of our PGP. Should you or your staff have any concerns regarding this issue, please do not hesitate to contact us.

Very truly yours,



John DeVincentis, Director  
Engineering and Licensing

JD:WJH:lw

Attachments

cc: Atomic Safety and Licensing Board Service List

ATTACHMENT A

PROCEDURE GENERATION PACKAGE  
AMENDMENTS

1. Writer's Guide
2. Plant Specific Guidelines
3. Training

### 3. Writers Guide for EOPs

#### 3.1 General

A Writers Guide for EOPs is a plant-specific document that provides instructions on writing EOPs, using good writing principles. In addition to establishing sound writing principles, the guide helps to promote consistency among all EOPs and their revisions, independent of the number of EOP writers.

The tab labeled "Writers Guide" in Exhibit B describes the writers guide for the Emergency Response Procedures (ERPs) for Seabrook Station that were used in the Westinghouse Owners Group ERG Validation Program. As a result of lessons learned during the Validation Program, a revised writers guide was generated. This revised guide is contained in the tab labeled "Seabrook Writers Guide". The Seabrook Writers Guide will be revised, as necessary, based on feedback from operator training and experience.

#### 3.2 Document Description

Information on the following major items is included in the writers guide:

- \*Purpose and Scope
- \*ERP Designation and Numbering
- \*ERP Format
- \*Writing the Procedure
- \*Status Tree Format
- \*Mechanics of Style
- \*Printed Format
- \*Reproduction

AMENDMENT TO PROCEDURES GENERATION PACKAGE

Pg. 2 item 2 titled - Plant-Specific Technical Guidelines

Add a third paragraph.

After being reviewed by both Seabrook Station and Westinghouse personnel, neither participant found any items that could be considered safety significant. This review covered both equipment and instrument differences that exists between the plant specific procedures and the generic guidelines. In addition after the validation program was completed no problems were encountered because of these differences.

AMENDMENT TO PROCEDURES GENERATION PACKAGE

Pg. 3 item 3 titled - Writers Guide for EOPs

3.1 General - change the last sentence of the second paragraph to read.

The Seabrook Writers Guide will be revised, as necessary, based on feedback from operator training and experiences. This feedback will be evaluated on two levels. Those request for word changes, notes or cautions will be made at the station and forwarded to the Westinghouse Owners Group for information. Those request for change that involve step changes either addition or deletion will first be forwarded to the Westinghouse Owners Group feedback program before the procedure revision. This contact with the WOG is to ensure that the generic intent is not disturbed by the change.

In the course of review if the WOG feels the revision information is generic or has no value toward upgrading the generic set of guidelines the station will make the final decision as to the use within the Seabrook Station procedure set.

In addition any issues that remain unresolved between Seabrook Station and the WOG as to the outcome of a suggested revision are solely the stations responsibility to close out.

## 2. Plant-Specific Technical Guidelines

The Westinghouse Emergency Response Guidelines (ERGs), Revision 1, were based on a "REFERENCE" plant design. To correct the ERGs to Seabrook-specific guidelines, differences between the REFERENCE plant and Seabrook Station were identified. The combination of the ERGs (generic guidelines) and the Seabrook Station/REFERENCE plant comparison satisfies the requirement for plant-specific technical guidelines.

Appendix F of Exhibit A contains the Seabrook Plant Description developed by comparing the Seabrook design to the REFERENCE plant systems description. Appendix F highlights the differences between Seabrook Station and the REFERENCE plant and was used to tailor the ERGs to Seabrook-specific EOPs.



AMENDMENT TO PROCEDURES GENERATION PACKAGE

Training

Since our original submittal we have formalized our training on Emergency Response Procedures to a greater detail. Presently we are introducing the student to our ERPs in a 3 day (8 hr/day) classroom lesson. This is presented in our detailed systems section of the training program. This portion of the program introduces the students to the ERPs as to the rules of usage, understanding a two column format and walkdowns of the MCB indicating where the expected parameters should be viewed to respond to these procedures. Following detailed system the simulator portion of the training program is scheduled. This is an 8 week program where the operator actually stands a watch period on the simulator board. There is classroom instruction as to coming events and then 5 hours of continuous board operation and response to abnormalities. In the 8 week period there are 10 lessons directly related to emergency response procedure usage. Coupled, these portions of the program create 3 weeks worth of attention given to ERP usage.

As a guideline for judging the effectiveness of our program, enclosed as attachments are the 10 student handouts that show the direct association with ERPs. In addition a listing of possible malfunctions that are available in our simulator. Those items circled are those that we are using to offer the first licensing students their upset conditions. (Retraining upsets have not yet been finalized.) As can be seen by review not all abnormalities will cause ERP usage. But if the operator does not respond properly to the abnormal condition, reactor trip is evident. This is mentioned to explain that during any time in the 8 week period that if a self induced trip is seen, the operators must respond with ERP usage until at least in post trip recovery or other appropriate plant operating procedures.