

September 18, 1985

In reply, please
refer to LAC-11154

DOCKET NO. 50-409

U. S. Nuclear Regulatory Commission
Attn: Mr. John A. Zwolinski, Chief
Operating Reactors Branch #5
Division of Licensing
Office of Nuclear Reactor Regulation
Division of Operating Reactors
Washington, DC 20555

SUBJECT: DAIRYLAND POWER COOPERATIVE (DPC)
LA CROSSE BOILING WATER REACTOR (LACBWR)
PROVISIONAL OPERATING LICENSE NO. DPR-45
REQUIRED ACTIONS BASED ON GENERIC IMPLICATIONS
OF SALEM ATWS EVENTS (GENERIC LETTER 83-28)

REFERENCES: (1) NRC Letter, Zwolinski to Taylor
dated July 26, 1985.
(2) NRC Letter, Generic Letter 83-28,
Eisenhut to All Licensees, dated July 8, 1983.
(3) DPC Letter, Linder to Eisenhut
LAC-9392, dated October 25, 1983.

Dear Mr. Zwolinski:

Reference 1 requested additional information on Generic Letter 83-28, Item 1.1, "Post-Trip Review" (Reference 2). Dairyland Power Cooperative's (DPC) initial response was submitted in Reference 3 on October 25, 1983. Based on the request for additional information, DPC is implementing procedure changes to more formally address the post-trip review process at LACBWP. Responses to the information request are as follows:

NRC Item 1

The licensee needs to submit information clearly defining the responsibilities and authorities of the personnel who will perform the post-trip review and analysis. We recommend that the post-trip review team include a member of plant management at the Shift Supervisor level on the plant and who has the responsibility and authority to obtain all necessary personnel and data to ensure a thorough and complete post-trip review. In addition, the post-trip review team should include a Shift Technical Advisor or an engineer who has had special transient analysis training. These two people should have a joint responsibility to concur on a decision/recommendation to restart the plant.

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DPC Response

The post-trip review team will include the Shift Supervisor, Shift Technical Advisor (STA) and the Plant Superintendent or his designated alternate. Team member communications may be via telephone. The team may be augmented by additional members of the plant staff, if desired by the basic team members.

NRC Item 2

The licensee needs to address the methods and criteria comparing the event information with known or expected plant behavior. We recommend that the pertinent data obtained during the post-trip review be compared to the applicable data provided in the LACBWR Safeguards Report to verify proper operation of the systems or equipment. Where possible, comparisons with previous similar events should be made.

DPC Response

Personnel on the team receive transient analysis training. The Training Manual and the Safeguards Report (SAR) are readily available for reference at the plant. Also available are prior incident reports. Depending on the nature of an event, one or more of these references may be used during the review of a transient.

NRC Item 3

The licensee needs to address the criteria for determining (1) the acceptability of restart for any unscheduled reactor trip, and (2) the need for independent assessment of an event. We recommend that if any of the restart criteria listed below are not met, an independent assessment of the event should be performed by the Operations Review Committee or a group with similar authority and experience. In addition, the licensee should have procedures to ensure that all physical evidence necessary for an independent assessment is preserved.

Recommended restart criteria:

- a. *The post-trip review team has determined the root cause and sequence of events resulting in the plant trip.*
- b. *Near term corrective actions have been taken to remedy the cause of the trip.*
- c. *The post-trip review team has performed an analysis and determined that the major safety systems responded to the event within specified limits.*
- d. *The post-trip review has not resulted in the discovery of a potential safety concern (e.g., the root cause of the event occurs with a frequency significantly larger than expected).*

DPC Response

The following restart criteria are being implemented. LACBWR Administrative Control Procedure 18.1, "Collection, Storage, and Maintenance of LACBWR Quality Assurance Records" establishes retention requirements for plant logs and operational charts.

Restart Criteria

1. Cause of scram identified to the best knowledge of the post-trip review team. If a cause of the scram cannot be determined or postulated with any degree of assurance, an ORC meeting shall have been conducted prior to restart.
2. Corrective actions determined necessary have been taken or equipment at fault not required for startup.
3. Any abnormal response to the transient by safety related systems has been identified and associated problems resolved.
4. SRC subcommittee meeting conducted if low water level scram occurred coincident with Emergency Core Cooling System problems or if had significant loss of coolant accident.
5. Requirements of Technical Specification 6.7 met if a safety limit was violated.
6. Plant Superintendent or designated alternate has authorized restart.

NRC Item 4

The licensee has not provided, for our review, a systematic safety assesement program to assess unscheduled reactor trips. We recommend that the licensee develop a systematic safety assessment program in accordance with the guidelines provided below.

Recommended guidelines:

- a. The criteria for determining the acceptability of a restart of the plant.*
- b. The qualifications, responsibilities, and authorities of key personnel in the post-trip review process.*
- c. The methods and criteria for determining whether plant parameters and system responses were within the limits provided in the LACBWR Safeguards Report.*
- d. The criteria for determining the need for an independent review.*

Mr. John Zwolinski, Chief
Operating Reactors Branch #5

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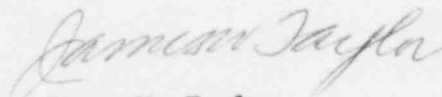
DPC Response

The responses to Items 1-3 cover the LACBWR post-trip review program. Section 1.2, Post-Trip Review - Data and Information Capability, of Reference 3 discusses the data available for review.. This data is used by the operating crew and post-trip review team in determining the adequacy of plant response.

If there are any questions, please contact us.

Yours truly,

DAIRYLAND POWER COOPERATIVE



James W. Taylor
General Manager

JWT:LSG:sks

cc: James G. Keppler, Region III
NRC Resident Inspector
John Stang, LACBWR Project Manager