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 FACIL: 50-397 WPPSS NUCLEAR PROJECT, UNIT 2, WASHINGTON PUBLIC POWE 05000397
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 VARGA, S.A. OFFICE OF NUCLEAR REACTOR REGULATION

SUBJECT: PROPOSES COURSE OF ACTION TO FACILITATE ROUND 2 REVIEW ON
 PROJECT 2 FOR BEST & MOST EFFICIENT UTILIZATION OF MANPOWER
 & RESOURCES AT NRC, WPPSS & CONTRACTORS. REQUESTS NRC TO
 PROVIDE GENERIC CONCERNS FOR SIMILARLY DESIGNED PLANTS.

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 TITLE: PSAR/FSAR AMDTs AND RELATED CORRESPONDENCE.

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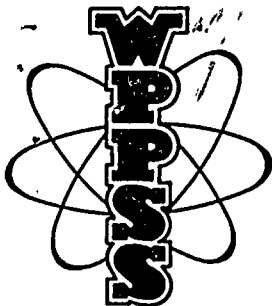
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Docket No. 50-397

G02-79-93
May 11, 1979

Director, Office of Nuclear Reactor Regulation
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Attention: Mr. S. A. Varga, Chief
Branch No. 4
Division of Project Management

Subject: WPPSS NUCLEAR PROJECT NO. 2
FACILITATING THE ROUND 2 REVIEW

Reference: Letter, NRC to WPPSS, "First Round Questions on the
WNP-2 OL Application - ICSB", March 28, 1979

Dear Mr. Varga:

Summary

The purpose of this letter is to propose a course of action to facilitate the Round 2 review on the WNP-2 docket for best and most efficient utilization of manpower and resources both at the NRC and at WPPSS and its contractors. The basic thrust is to request the NRC to formally provide a list of generic concerns applicable to plants similar in design to WNP-2 and accepted resolutions of these concerns on the plants in the more advanced stages of review. WPPSS in turn will formally address each of these issues and identify a course of action to the NRC. It is hoped that this effort will obviate the need for many Round 2 questions and leave Round 2 for concerns and positions particular to WNP-2. This will allow for the most efficient use of manpower and allow for potential design changes to be identified early for minimal schedule impact. The "Background" section below discusses the recent history of this whole problem and the WPPSS perspective of it. The "Recommendations" section summarizes our suggestions and defines our actions in more detail. A meeting is proposed, in addition, to further discuss the ramifications of this letter.

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Background

The referenced letter indicated concerns about the adequacy of our FSAR to support issuance of an operating license in the area of the Instrumentation and Control Systems Branch review. In particular, the concerns centered on a lack of auto-updating our docket with respect to the development of NRC issues on similar dockets at a more advanced stage of review, with the consequential need to ask repetitious chains of questions. This repetition was noted as being unduly burdensome and wasteful, especially considering staff manpower limitations and schedule restraints. It was also asserted that our FSAR contains many vague and conflicting statements making review difficult. It was thus proposed that WPPSS take the initiative to further upgrade the FSAR to account for these staff concerns. A management meeting held at your offices April 19th to discuss these matters also pointed out that your concerns were generic in nature and not just applicable to the I&C area. We also learned that the staff had, until recently, spent relatively little time reviewing our revised FSAR (submitted in March 1978) in the I&C area. As a consequence, a meeting was proposed for mid-May whereby we would present our conceptual answers to the I&C Round 1 concerns, endeavoring to be more responsive the first time and eliminate the need for the repetition of the question chains on other dockets. Subsequent reevaluation of this concept, however, leads us to believe that the benefits possible from such a meeting to resolve the main issues of concern are minimal and that a different approach should be proposed. Accordingly, we request that you cancel the meeting request made at that time and take into consideration the following comments.

The auto-update of FSAR's and plant designs with respect to positions developed on dockets at a more advanced stage of review is not realistic under the current scheme. We do follow the review process on other dockets of plants of similar design with great interest. However, we only come by this information on other dockets by indirect, unofficial, and often belated means. Furthermore, the information on staff issues from the utility point of view is often not clear-cut and is speculative as to outcome. Also, in general, we have not been a party to the dialogue addressing many of these concerns on other dockets. Accordingly, it is certainly not reasonable to expect us to unilaterally revise our docket and design with respect to these apparent staff positions. Superimpose on this also that much of this information is evolutionary in nature, subject to compromise and debate over many years time, and often subject to apparent pressures, schedules, and conditions which are unique to a particular docket.

It should be noted, however, that where clear and firm information from other dockets indicates a design change is necessary, whether from staff review or not, we make the change. Some examples of this are deletion of the CRD return line, automatic switchover of RCIC suction from the condensate storage tank to the suppression pool, and design of valve arrangements for Containment Isolation. We also try to take into

account the chains of questions on other dockets when we receive an NRC question to try and get to the basis of the staff's concern the first time. Accordingly, we at WPPSS believe we are doing what we have justification to do.

WPPSS Actions and Recommendations

Notwithstanding the comments above, the reality of the situation is clearly lack of manpower and tight and conflicting schedules and priorities on both our parts. In light of this and the general thoughts, recommendations, and concerns in your letter transmitting the I and C Round 1 questions to us, we have the following to offer:

- (1) WPPSS is unilaterally re-reviewing the entire FSAR at the utility level to remove any inconsistencies and conflicting statements and to insure accurate reflection of the current plant design. This review is expected to be completed by the end of May and is emphasizing the I and C area. Draft FSAR changes will be submitted to you by letter for your information.
- (2) WPPSS has extensive programs underway reviewing the WNP-2 seismic and environmental qualification data. This effort will culminate in revised FSAR sections 3.9, 3.10, and 3.11. We welcome the opportunity to discuss our programs with you.
- (3) WPPSS is developing its Technical Specifications based on NUREG-0123, Rev. 1, April, 1978. The Zimmer, La Salle, and Hatch Tech Specs are being considered along with this development. The tech specs are being planned to be submitted in the Fall.
- (4) We request the staff develop a coherent list of their generic issues and statements of position for our generic class of plants and formally transmit them to us. This is not easy for us to do just based on staff questions. Many diverse questions are not clear cut and can center around one fundamental issue. It would also be helpful to identify to us any resolutions relative to these issues which have been worked out on other dockets. We will, in turn, evaluate this list relative to our design and report back to you our status and decisions for future action relative to the list.
- (5) With respect to the I and C concerns in specific, we request a meeting with you on this subject after you receive our formal responses to the Round 1 questions. The purpose of the meeting would be to discuss our responses and our efforts relative

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to items (1) through (4) and to discuss any additional concerns you might have in the I and C area. The time frame envisioned for this meeting is early July. Naturally, to permit maximum benefit for this meeting, the item (4) list from you should be received as soon as possible.

- (6) With respect to the general staff concerns, WPPSS will answer the Round 1 questions according to schedule as feasible. It is proposed that after the staff receives and evaluates our responses, and in concert with the item (4) effort, that we develop a list of open items and issues for WNP-2 to better focus the Round 2 review.

We hope you find these comments worthwhile and take them into serious consideration. We would like to meet with you to discuss them further. In the near future, our Licensing Engineer, Mr. Keener Earle, will be in contact with you to arrange the meeting.

Very truly yours,



D. L. RENBERGER
Assistant Director
Technology

DLR:OKE:cph

cc: I. Littman - WPPSS, NY
J. Ellwanger - B&R
FA MacLean - GE/San Jose
JJ Byrnes - B&R
CR Bryant - BPA
E. Chang - GE/San Jose
JJ Verderber - B&R
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WNP-2 Files

