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ACCESSION NBR: 8104070450. DOC. DATE: 81/04/02. NOTARIZED: NO DOCKET # 05000397
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power
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 RECIP. NAME: RECIP. AFFILIATION: Division of Licensing

SUBJECT: Comments on encl fact sheet providing status of licensing activities. Estimated const completion date of Jul 1983 is unsubstantiated & unwarranted at this time.

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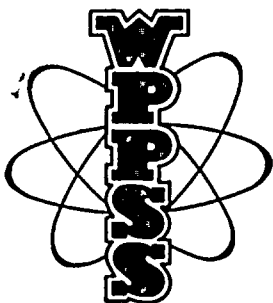
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Washington Public Power Supply System
A JOINT OPERATING AGENCY

50-397

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April 2, 1981
G02-81-69

Director, Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555



Dear Mr. Eisenhut:

Subject: COMMENTS ON WNP-2 LICENSING STATUS SHEET

In our discussions on March 5, 1981, in Bethesda, you requested our comments on a one-page fact sheet (see Attachment 1) regarding the licensing status of our WNP-2 plant that was used in the Commission briefing of February 26, 1981. As a general point we suggest that the information included should be factual and that highly judgmental statements should be avoided. Specific comments are noted below:

1. As we discussed in detail during our meeting, we believe the 7/83 NRC Estimate of Construction Completion is unsubstantiated and unwarranted at this time. We are currently making a detailed bottoms-up schedule re-assessment. Upon completion in the June 1981 time frame we suggest an NRC review of our scheduling and construction status. In the meantime we would like to request that you avoid NRC completion estimates that do not have a good basis because of the severe adverse impacts such estimates can have on us.
2. We suggest that under "Safety Review Status", the WNP-2 participation in the near term BWR Licensing Review Group (LRG) be noted and that a date for a "partial draft Safety Evaluation Report" (SER) resolving generic LRG issues be identified.
3. Even without a hearing we do not believe four months is sufficient time between SER issuance and fuel loading. We suggest that in June 1981, when an integrated schedule is available, your licensing schedules be modified to allow adequate time for ACRS meetings, public hearing contingency and Commission issuance of our OL.
4. Issues that might be listed under the bullet ". Number and basic subject of Outstanding Issues Non-TMI" include:

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- a) Review of catalytic hydrogen recombiners
 - b) Review of new geology data
 - c) Verification of plant adequacy in view of QA/QC problems encountered during construction
5. Under "Other Items of Importance" any conclusion regarding a change in the design basis seismic event for the region we believe is premature.
6. Under "Emergency Planning" the Supply System Emergency Plan for the Hanford site is complete and was submitted on the WNP-2 Docket in late March 1981. The required state and local plans will be complete and submitted to FEMA by the end of April 1981. FEMA has indicated they expect to complete their review by July 1981.
7. In our view, the entire paragraph under "Other Special Problems or Considerations" is inaccurate and unnecessarily negative and judgmental. The labor strike at WNP-2 was settled in November 1980 and construction work is currently progressing ahead of our new three-month schedule. The activities necessary to resolve the Region V work stoppage are nearing completion and safety related work has resumed on several systems. We expect to be substantially released for work during April 1981.

The Supply System has implemented major internal management changes and retained Bechtel as the plant completion and start-up contractor to supplement Burns and Roe as the architect-engineer for WNP-2. These changes along with implementation of effective management systems for the project we believe will correct any past deficiencies in management of the project.

We suggest that a case load forecast by the NRC staff would be appropriate in June 1981 after completion of an on-going effort to develop an integrated project schedule which accounts for effects of the strike and work stoppage.

Very truly yours,



G. D. Bouchey
Director, Nuclear Safety

Attachment 1 - Fact Sheet

cc: N.S. Reynolds (D&L)
J. Plunkett (NUS)
R.L. Tedesco (NRC)
B.J. Youngblood (NRC)

Docket No.:	50-397	NRC Estimate Construction Completion:	7/83
Location:	Richland, Washington	Application Estimate Construction Completion:	7/82
Utility:	Washington Pub. Pow. Su. Sys.	SER Issued:	3/82
Vendor:	General Electric	SSER Issued:	6/82
Reactor Type:	BWR	ASLB Decision:	N/A
Containment Type:	Mark II/free standing steel shell	OL Issuance Estimated:	7/82
Architect/Engineer:	Burns & Roe		
MWe Rating:	1100		

Overview

CP Issued: CPPR-93 3/19/73 CP Hearings: 1/26/73 (one day)
 Major Issues at CP Stage: Potential faulting close to site
 OL FSAR Docketed: 6/78 Last Amendment Submitted: No. 12 12/17/80

Safety Review Status

- . Status of Q-1, Q-2: Q-1's completed
- . Number and basic subject of Outstanding Issues Non-TMI: (unknown)
- . Number and basic subject of Outstanding Issues - TMI: NUREG-0737
- . Unique Design Features: free standing steel containment and GE cross-quencher
- . ACRS Meeting: 4/82 E
- . Commission Briefing: 6/82 E
- . Other Items of Importance, Potential Problems: Recent developments in geology & seismology may cause a revision in the design basis seismic event require investigation evaluation
- . Emergency Planning:

Environmental Review Status

- . DES Date: 7/81
- . FES Date: 12/81
- . Class 9 Evaluation Required: (yes) ?

Hearings

- . Noticed: 7/78 Discovery Completed: N/A Expected Start: N/A Expected End: N/A
- . Major Intervenors: N/A
- . Major Contentions: N/A
- . Other Items: Petitioners denied status of Intervenors based on extreme distance (180 miles) from site

Other Special Problems or Considerations

- . Project slipping schedule steadily due to strikes, low worker productivity and Stop Work actions by Region V; significant failures in the QA/QC system; Caseload Forecast Panel visit will be made since slippage is greater than six months; apparent weaknesses in utility management

