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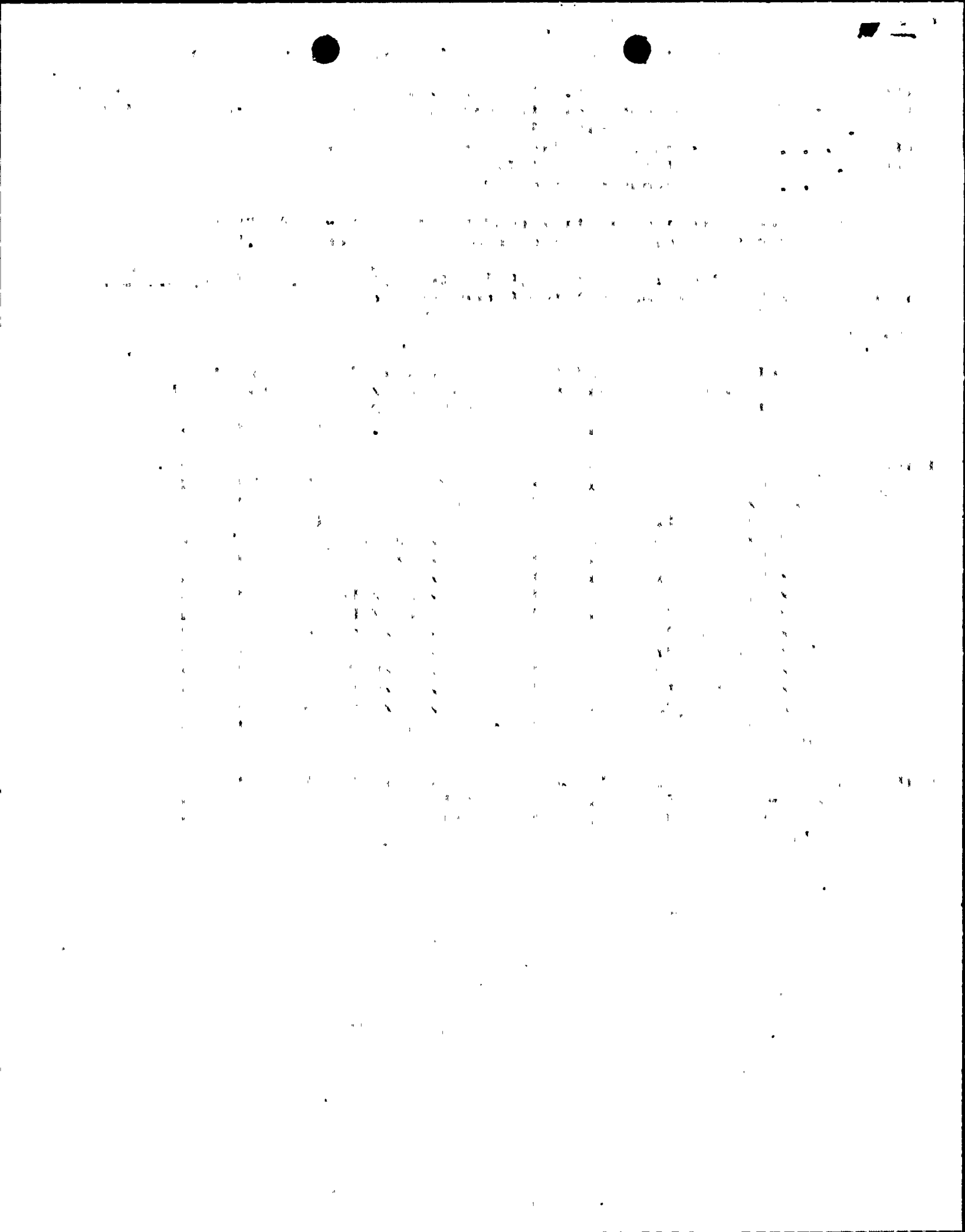
SUBJECT: Forwards revised initial response to NUREG-0803, "Safety  
 Concerns Associated W/Pipe Breaks in BWR Scram Sys."

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## Washington Public Power Supply System

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April 22, 1982

G02-82-395

SS-L-02-CDT-82-047

Docket No. 50-397

Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555



Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2  
NUREG-0803

Reference: Letter G02-82-37, G.D. Bouchey (SS) to  
A. Schwencer (NRC), "Safety Concerns  
Associated with Pipe Breaks in the BWR  
Scram System", dated January 13, 1982

During a recent telephone conversation with Messrs. J. Ridgley and R. Auluck, NRC staff, and Mr. R.M. Nelson, Supply System, it was requested that we clarify our position on NUREG-0803. We have addressed this concern by revising our initial response (per the referenced letter). This revised page one of the initial response is attached for your review.

Very truly yours,

G. D. Bouchey  
Deputy Director, Safety and Security

KP/jca  
Attachment

cc: R Auluck - NRC  
WS Chin - BPA  
R Feil - NRC Site  
J Ridgley - NRC

*Boo!*  
*5/11*

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Safety Concerns Associated with Pipe Breaks  
in the BWR Scram System

- References:
1. Letter from R. L. Tedesco (NRC) to R. L. Ferguson (Supply System), "Safety Concerns Associated with Pipe Breaks in the BWR Scram System", dated April 24, 1981.
  2. GE Evaluation in Response to NRC Request Regarding BWR Scram System Pipe Breaks, NEDO-24342, dated April, 1981.
  3. Letter MFN-091-81, G. G. Sherwood (GE) to D. Eisenhut (NRC), "NRC Report, 'Safety Concerns Associated with Pipe Breaks in the BWR Scram System'", dated April 30, 1981.
  4. Generic Letter 81-34, Darrell G. Eisenhut (NRC) to All GE BWR Licensees, Same Title, dated August 31, 1981, NUREG-0803, enclosed.

## 1.0 INTRODUCTION

In response to your request for a generic evaluation within 45 days of the Scram Discharge Volume System, (SDV) (Reference 1), GE reviewed the SDV against the general design criteria and it was concluded that the generic SDV design is in conformance with GDC 14, GDC 35, GDC 55, 50.2(v), 50.55a (including footnote 2), and 50.46 of the Commission's regulations. The generic evaluation report (Reference 2) was transmitted to you on April 30, 1981 (Reference 3).

In addition to your request for the generic evaluation, you also requested, within 120 days, a plant specific evaluation of the applicability of the 45 day generic evaluation. The WNP-2 SDV has been reviewed on a plant specific basis by a team of Supply System engineers using AE input and confirmed by a plant walkdown. The generic report was found to envelop the WNP-2 plant design. Further NRC guidance was provided in NUREG-0803 (Reference 4) as to an acceptable plant specific, 120 day response for this issue. The Supply System response is enclosed in a format compatible with Section 5 of NUREG-0803, i.e., after a section describing recent or proposed SDV changes, the following sections describe our response to Piping Integrity (Section 3.0), Mitigating Capability (Section 4.0), and Equipment Qualification (Section 5.0).

As discussed in Sections 3.5 and 6.2 of Reference 2, line breaks in the insert/withdrawal lines are limited in leakage by the CRD piston seals to 5 gpm for badly worn seals to less than 10 gpm even with the CRD seals completely removed. The results of such leakage are conservatively bound by postulated instrument line breaks, as discussed in the FSAR and Reference 2. Therefore, the following plant-specific 120 day response is concerned only with the limiting SDB break scenario.

## 2.0 SYSTEM DESIGN

The WNP-2 SDV has been evaluated against the Generic Safety Evaluation Report, "BWR Scram Discharge System", dated December 1, 1980. The evaluation indicated that the installed system design satisfies the