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 BOUCHEY,G.D. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION
 DENTON,H.R. Office of Nuclear Reactor Regulation, Director

SUBJECT: Requests ACRS subcommittee meeting be delayed only 4 wks.
 since response to geology questions submitted 4 wks late.
 Addl delay could generate another series of questions
 depleting util resources but resulting in no plant changes.

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Washington Public Power Supply System

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June 11, 1982
G02-82-537

Docket No. 50-397

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation/NRC
Phillips Building, Room P-404A
7920 Norfolk Avenue
Bethesda, Maryland 20014

Dear Mr. Denton:

Subject: NRC REVIEW OF HANFORD SEISMIC ISSUES

Reference: TWX, R. L. Ferguson to W. J. Dircks,
same subject, November 5, 1981

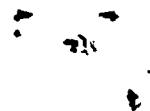
The referenced TWX identified the need for timely completion of the NRC evaluation of Hanford geology and seismology in support of the WNP-2 Operating License review, and expressed our concern about perpetuation of geology programs that do not contribute to increased plant safety margins.

In the past few months, failure to complete the geology review as part of the WNP-2 SER issued in March 1982, resulted in rescheduling of the ACRS subcommittee meeting for WNP-2 from April 1982, to June 1982. Recently, we have been informed that the ACRS subcommittee meeting will again be delayed by one to three months because the geology review is still incomplete.

In late February 1982, at the time of final SER preparation, it was our understanding that only one significant seismic issue remained. In order to resolve this issue, the staff required additional field borings in the vicinity of the Southeast Anticline to confirm the non-capability of a small inferred fault. Following issuance of the SER, new questions were raised in addition to the Southeast Anticline issue. As a result, the Supply System has been required to expend more than \$0.5 million in the past three month period (March through May 1982) to provide responses to geology questions.

Nonetheless, it is my understanding that the results of the new work on the Southeast Anticline, along with Supply System responses to all of

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HR Denton
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NRC Review of Hanford Seismic Issues

the new post-SER questions will have been completed and submitted to the staff on or before June 11, 1982. Our assessment remains that the original design basis earthquake is fully adequate for the Hanford site.

Previously, the staff indicated that May 14, 1982, was the deadline for geology submittals in order to support an ACRS subcommittee meeting in late June. Since our response to these questions will be supplied only four weeks beyond the May 14 deadline, we respectfully request that the schedule for the ACRS subcommittee meeting be delayed no more than one month. I am concerned that any additional delay could unnecessarily result in the generation of another series of questions requiring additional Supply System funded geological/seismological research efforts.

Based on our experience with the Operating License stage review of siting issues associated with WNP-2, in particular the geology and seismic issues, the Supply System has sent a letter to the Chairman of the NRC regarding the in-depth reviews of siting issues that are conducted at the Operating License stage. I am convinced that siting issues (such as the WNP-2 seismic design basis adequacy) that were resolved in the Construction Permit proceedings are excessively reevaluated in the Operating License reviews. These reviews deplete our resources, rarely result in plant changes and cause licensing delays. Although we would not expect our comments to the Chairman to have a major effect on the WNP-2 process, we have enclosed a copy for your information and consideration.

Very truly yours,



G. D. Bouchey, Deputy Director
Safety & Security

GDB/sm
Enclosure

cc: R AuLuck NRC
WJ Dircks NRC
RE Jackson NRC
NS Reynolds D&L
A Schwencer NRC

