

# REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

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 SCHWENCER, A. Licensing Branch 2

SUBJECT: Comments on NRC 820629 response to 820514 ltr re tornado  
 missile protection for diesel generator exhausts. Backfitting  
 would not justify cost. Requests item be deleted from SER  
 open item list.

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## Washington Public Power Supply System

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July 23, 1982  
G02-82-620

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

Dear Mr. Schwencer:

Subject: WNP-2 TORNADO MISSILE PROTECTION  
FOR DIESEL GENERATOR EXHAUSTS

References: 1) Letter, GD Bouchey to A Schwencer, same subject,  
G02-82-466, dated May 14, 1982  
2) Letter, A Schwencer to RL Ferguson, same subject,  
dated June 29, 1982

Reference 1 provided the Supply System position on tornado missile protection of the diesel generator exhausts and ample technical justification in support of this position. The NRC Staff responded in Reference 2 that the Standard Review Plans are utilized by the Staff as guidance documents only and compliance is not mandatory and indicated that backfitting of WNP-2 to provide positive physical protection of the diesel exhausts for WNP-2 would not be required. In lieu of physical protection, the Staff suggested that:

- 1) The Supply System have control of the bluff area of concern and commit that no loose materials including utility poles will be stored there during the life of the facility; and
- 2) The Supply System confirm that the failure of one of the two diesel generator exhaust openings will not result in the diesel's failure to start and produce sufficient power to safely shut down the reactor assuming a single failure in the redundant diesel generator system.

Regarding the first suggestion to commit to administrative controls to preclude any "loose material" on the knolls above Elevation 448', we believe that such controls are unnecessary and would represent an inappropriate burden on the plant operating staff. The plant staff has many important matters associated with plant operation that must

Boo!



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be carefully controlled, and imposition of additional unnecessary controls that must be maintained for the life of the plant is, in our view, not in the best interest of safe operation of the plant.

We believe it is important for the Staff to note the insignificance of the geographic features in question. It is hardly appropriate to term them a "bluff area" per Reference 2. As shown schematically in Figures 1 and 2, the highest point of elevation within one-half mile of the plant is below the elevation of the diesel exhaust. Further, the nearest point with a ground elevation higher than 448' (30 feet below the diesel exhausts) is more than 1,000 feet from the plant.

Considering the extremely low probability of the scenario of a tornado of sufficient velocity to lift large, heavy missiles up to 30 feet above grade and transport them more than 1,000 feet and plug or otherwise disable the diesel exhausts (22" diameter pipes), it remains our conclusion that additional protection is technically unwarranted and that the suggested administrative controls are unnecessary.

With respect to the second Staff suggestion, the Supply System response per Reference 1 (Attachment 1) clearly demonstrates that the failure of any one diesel generator exhaust opening due to a tornado missile is a very low probability event. Backfitting of the WNP-2 diesel generators to assure that plugging of one of the two exhausts associated with each generator could not disable that unit would not result in a significant improvement in safety due to a tornado. The safety benefit of such a backfit would not justify the cost.

We request that, based on the additional information provided herein and the information provided previously, this item be deleted from the WNP-2 Safety Evaluation Report Open Items List.

Very truly yours,



G. D. Bouchey, Deputy Director  
Safety and Security

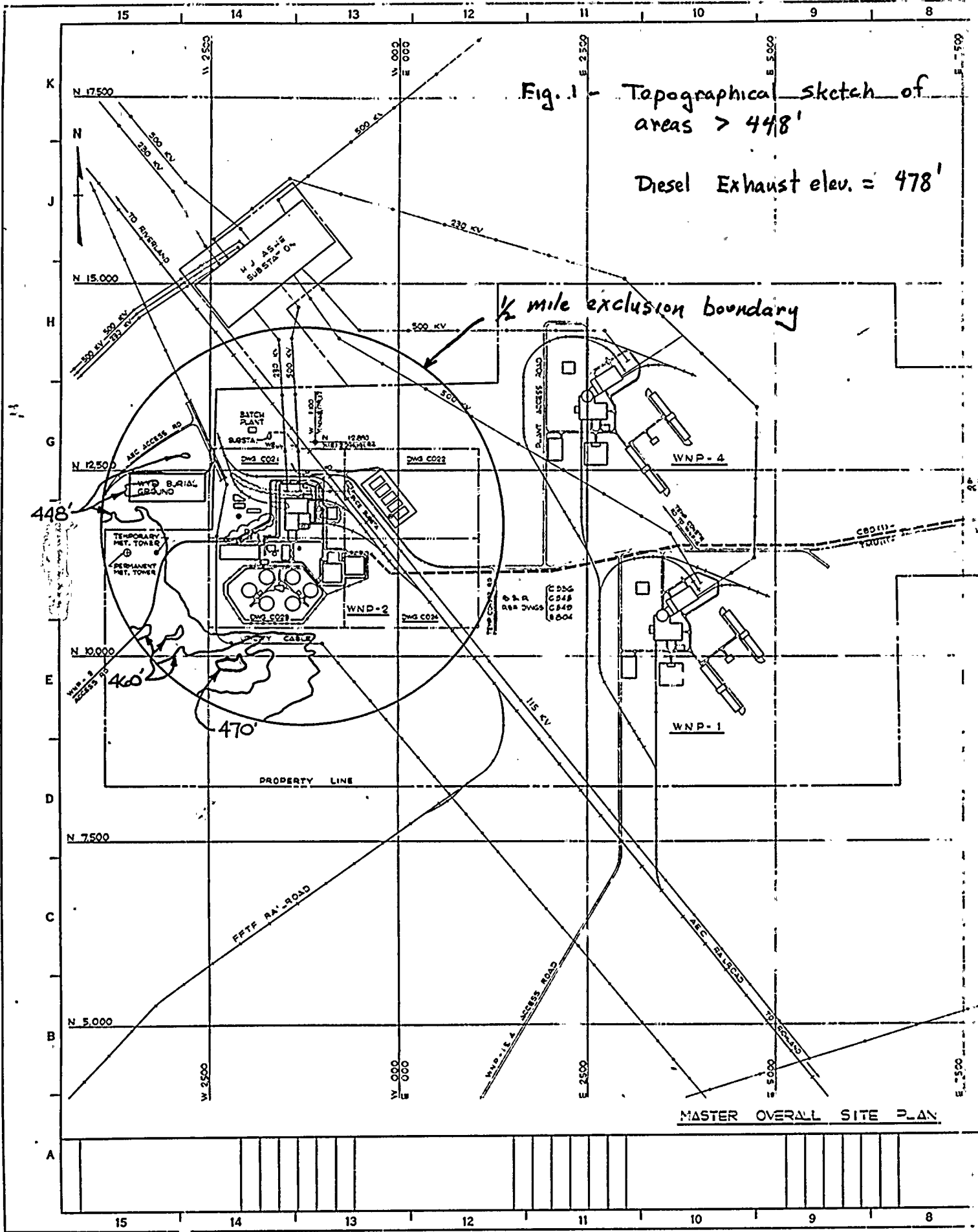
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Attachments

cc: R. Auluck - NRC  
DG Eisenhut - NRC  
NS Reynolds - D&L  
RL Tedesco - NRC  
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R. Feil - NRC 917Q  
EF Beckett - NPI



Fig. 1 - Topographical sketch of areas > 448'

Diesel Exhaust elev. = 478'



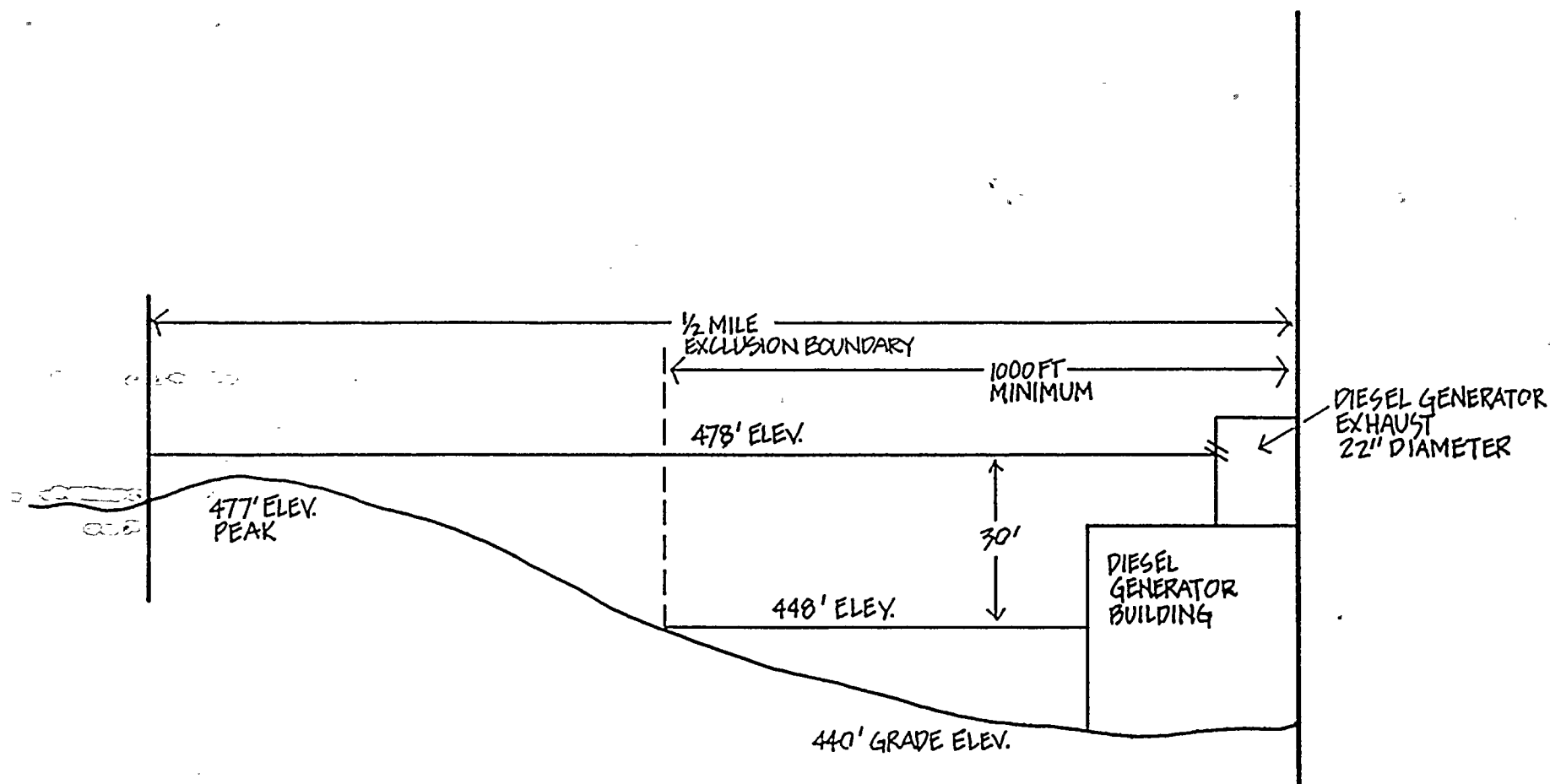


FIGURE 2. SCHEMATIC WNP-2 EXCLUSION AREA TOPOGRAPHY RELATED TO THE ISSUE OF TORNADO PROTECTION OF THE DIESEL GENERATOR EXHAUST.



