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AUTH.NAME AUTHOR AFFILIATION
BOUCHEY,G.D. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Forwards proposed schedule re current status of emergency response capability per Region V 830301 meeting (Genric Ltr 82-33 & Suppl 1 to NUREG-0737).

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TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

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Washington Public Power Supply System
P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

April 15, 1983
G02-83-346
Docket No. 50-397

Director of Nuclear Reactory Regulation
Attention: 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
EMERGENCY RESPONSE CAPABILITY

Reference: NRC Generic Letter No. 82-33, "Supplement 1 to NUREG-0737 - Requirements for Emergency Response Capability", dated December 17, 1982

The referenced letter (82-33) requested a proposed schedule for completing the basic requirements identified by NUREG-0737, Supplement 1 for: SPDS, Detailed Control Room Design Review, Regulatory Guide 1.97, Emergency Operating Procedures, Integrated Training Plan, and Emergency Response Facilities.

Due to the construction and licensing status of WNP-2 at the time of the TMI accident the Supply System commenced an aggressive program to ensure that Supply System units were responsive to the problems identified by TMI. The Supply System authorized both a corporate review board and "WNP-2 TMI Program" to assess the TMI impact and recommend appropriate changes. Additionally, WNP-2 has actively participated on the BWR Owners Group Subcommittees addressing TMI concerns, specifically: Emergency Operating Procedures (EOP), Control Room Design Review (CRDR), SPDS, Graphic Display System (GDS), and Regulatory Guide 1.97. These efforts have lead to completion or near completion of those items identified in Generic Letter 82-33.

Current status, using the handouts provided at the NRC Region V Emergency Response Capability Meeting on March 1, 1983, is provided in the attached report.

Very truly yours,

G. D. Bouchey

PLP/jca
Attachment

cc: R Auluck - NRC
WS Chin - BPA
A Toth - NRC Site

A003
1/1

Nuclear Project No. 2
Emergency Response Capability

STATE OF WASHINGTON)
) ss
County of Benton)

Subject: _____

I, G. D. Bouchey, being duly sworn, subscribe to and say that I am the Manager, Nuclear Safety and Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATED April 15, 1983

G. D. Bouchey
G. D. Bouchey, Manager
Nuclear Safety & Regulatory Programs

On this day personally appeared before me G. D. BOUCHEY to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 15 day of April, 1983.

J. R. Martin
Notary Public in and for the
State of Washington

Residing at Richland, WA
12/86

EMERGENCY RESPONSE CAPABILITY

NRC Generic Letter 82-33

SPDS - The WNP-2 SPDS design concept, as discussed below in Implementation and Integration of Emergency Response Capabilities, is complete. The WNP-2 Final Safety Analysis Report describes the SPDS concept in Sections 7.5.1.5, 7.5.1.6, 7.5.1.15, 7.7.1.23, and Appendix B, Section I.D.2. GDS hardware has been installed, the system is being tested and a consultant has been contracted to conduct verification and validation of the system.

The Safety Analysis Report requested by 82-33 will be submitted by July 1, 1983, and the WNP-2 SPDS will be fully operable with operator training completed by November 1, 1983. Due to the completion status and training commitments the NRC pre-implementation review option proposed in 82-33 is not viable. Integration of the SPDS design as an input to the other initiatives is discussed at the conclusion of this report.

Detailed Control Room Design Review (DCRDR) - The DCRDR for WNP-2 was started in April 1980, and has been conducted similar to the program plan submitted by the BWR Owners Group to the NRC in August 1981. A preliminary WNP-2 Control Room Human Engineering Design Report was submitted January 11, 1982. Although considered insufficient in the WNP-2 Safety Evaluation Report, NUREG-0892, the report supplies information on the WNP-2 DCRDR effort. The Supply System intends to again submit a Preliminary Control Room Design Review Report on April 30, 1983, which will satisfy the program plan requirements of NUREG-0737, Supplement 1. Prior to submitting a Summary Report, overall plant operating experience and operator interviews resulting from both operating and outage experience must be evaluated with respect to Control Room changes. To allow sufficient time to gain operations experience the Supply System will submit the WNP-2 Summary Report after the first refueling outage.

Regulatory Guide 1.97 - Compliance with Reg. Guide 1.97 is described in the WNP-2 Final Safety Analysis Report Section 7.5.2.3.e. This section incorporates docket correspondence provided in Supply System letter G02-82-30, submitted January 13, 1982. Additionally, the Supply System actively participates in BWR Owners Group efforts to resolve the inadequate core cooling issue with the NRC. With the exception of resolution of the inadequate core cooling issue the instruments as described in the WNP-2 FSAR will be functional prior to fuel load.

Emergency Operating Procedures (EOPs) - All WNP-2 EOPs have been drafted and are presently being reviewed for final approval. The BWR Owners Group generic guidelines submitted June 1, 1982, were used to prepare plant specific guidelines. The generation package requested by generic letter 82-33 was provided in Supply System letter G02-83-248, dated March 23, 1983. The WNP-2 staff will implement the EOPs by fuel load.

Integrated Training Plan - In order to support fuel load and operation by September 1983 an integrated training plan addressing the Emergency Response Capabilities has been developed and is in use at present. With the evident need for the systems to be in place and functional to support fuel load and operations it was recognized at the conception of each system that training of operators was vital to efficient use of each system. Hence, the training program is in existence and is being used to train the WNP-2 operators.

Emergency Response Facilities - The Emergency Response Facilities (ERFs) will be fully functional prior to exceeding 5% power. With the WNP-2 fuel load scheduled for September 1983 it is anticipated that a date concurrent with 5% power will be October 15, 1983. At present the structures for the Technical Support Center (TSC), Operational Support Center (OSC), and Emergency Operations Facility (EOF) are complete. Additional information on these facilities was submitted in Supply System letter G02-82-541, dated June 17, 1982. It should be noted that the EOF does not comply with siting and backup requirements addressed in NUREG-0737. This is documented in Supply System letter G.D. Bouchey (SS) to B. Grimes (NRC), "Siting of Emergency Response Facilities", dated March 20, 1981.

Implementation and Integration of Emergency Response Capabilities - As evidenced by the state of completion of the subject emergency response capabilities the Supply System program to address the TMI concerns has been successful in producing both plant modifications and administrative changes to WNP-2 since 1979. The resulting plant modifications have been reviewed, approved, and constructed in the same manner as any design change: design reviews, design specifications, purchase specifications, and construction following and QA programs. Approval of each design document was completed using multi-disciplined reviews as standard design practices.

To address integration of the SPDS, Control Room Design Review, Regulatory Guide 1.97, EOPs, ERFs, and Training the philosophy of the SPDS must be restated. As submitted by the BWR Owners Group Control Room Subcommittee the SPDS is the standard 1E seismically qualified control room instrumentation arrayed in a human factors configuration for easy appraisal and analysis combined with a Graphics Display System (GDS) providing CRT displays of specific plant parameters. This position and the GDS displays development program have been discussed with, and submitted to the NRC staff by the BWR Owners Group. This position ensures that modifications to the Control Room from the Human Factors Control Room Design Review affect the SPDS concept. Additionally, any SPDS developments in turn are reflected in the Control Room Human Factors Review. Hence, integration of the SPDS and Control Room Design efforts is assured.

At the conception of the WNP-2 TMI Program the responsibility for resolution and completion of each TMI concern was assigned to a lead technical reviewer, usually the system expert, or an individual having expertise in the specific area of concern. Since the Emergency Response Facilities, systems, and activities are so closely related and have been receiving close attention within the Supply System to assure adequacy and timely completion since 1979, coordination of review activities was recognized as a necessity. The WNP-2 TMI Program recognized this necessity. The TMI Program Manager was assigned responsibility to coordinate these efforts and ensure integration of the TMI activities. The TMI manager, the close relationship of the activities and the Supply System attention given the activities has assured their integration, and lead to the present state of completion related in this report.