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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: Responds to SER Suppl 2 (NUREG-0892) & TMI Action Item  
 II, K, 3.28 re surveillance requirements to ensure operability  
 of back-up air supply sys. Requirement on calibr of bottle  
 gauges contested & not included in Tech Specs.

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## Washington Public Power Supply System

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

June 22, 1983  
G02-83-552

Docket No. 50-397

Director of Nuclear Reactor 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  
NUREG-0892, SAFETY EVALUATION REPORT,  
SUPPLEMENT NO. 2, TMI ACTION ITEM II.K.3.28

Reference: Letter, G02-82-575, G. D. Bouchey (SS) to  
A. Schwencer (NRC), WNP-2 ADS Availability",  
dated July 1, 1982

The subject safety evaluation report presented four surveillance requirements to ensure operability of the back-up air supply system which were to be incorporated into the WNP-2 Technical Specifications. Requirements 1 through 3 are presently in the Standard Technical Specifications, NUREG-0123. The fourth requirement is not in the WNP-2 Technical Specifications or NUREG-0123, nor has the requirement been discussed or accepted by the Supply System. It is assumed that the reason for calibration of the bottle pressure gauges is due to usage of the gauges to determine if a bottle is leaking or in use.

As stated in the subject report, the daily bottle inspection is intended to provide advance warning of the potential for loss of an ADS subsystem. Calibration or accuracy of the gauges would not improve that capability since the intent of the surveillance is to determine only if the bottles are in use or leaking, and is not to determine system capacity. In addition, a failed gauge would be investigated in the same manner as a leaking bottle; i.e., it would be replaced. The referenced letter does not mention gauge calibration for the requirement nor was it discussed.

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A. Schwencer

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June 22, 1983

NUREG-0892, SAFETY EVALUATION REPORT, SUPPLEMENT NO. 2,  
TMI ACTION ITEM II.K.3.28

The intent of this letter is to take exception to the requirement of calibrating the bottle gauges and not include them in the WNP-2 Technical Specifications.

Should you have any questions concerning this matter, do not hesitate to contact either Mr. M. R. Wuestefeld (x-2843) or Mr. P. Powell (x-2298) at (509) 377-2501.

Very truly yours,



G. D. Bouchey

Manager, Nuclear Safety and Regulatory Programs

MRW/PLP/tmh

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

