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ACCESSION NBR: 8307070006 DOC. DATE: 83/06/30 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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 BOUCHEY, G.D. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Forwards revised "Environ Equipment Qualification Rept for
 Safety-Related Equipment," Vols 1-3. Rev provides response to
 concerns raised in Suppl 3 to SER (NUREG-0892).

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Washington Public Power Supply System

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

Docket No. 50-397

June 30, 1983
602-83-590

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
JUSTIFICATION FOR INTERIM OPERATION

This letter transmits the Supply System's revised Environmental Equipment Qualification Report for Safety-Related Equipment. This revision provides an update to the equipment list and responds to concerns raised in Supplement 3 to the Safety Evaluation Report (NUREG-0892). The list included in this report contains electrical equipment important to safety as required by 10 CFR 50.49(d). A major element of the revision is full development of our Justification for Interim Operation (JIO) of safety-related electrical equipment as required by 10 CFR 50.49.

The NRC Supplement No. 3 to the Safety Evaluation Report (SSER) raised a number of concerns. Some of those are responded to within the document being transmitted by this letter. It is appropriate to address some of the concerns in this letter itself.

The SSER requested discussion on how changes to equipment items resulting from IE Bulletins, Circulars, and Information Notices have been, or will be, evaluated for their impact on qualification. The Supply System has a controlled, documented process for review and disposition of such NRC documents. Plant changes flowing from such responsive actions are controlled by the design change control process.

The SSER called on us to reevaluate the adequacy of the plant walkdown performed before the staff's audit. The Supply System has caused system reviews to be conducted to add or delete items from the CIE list. These reviews improve the quality of the program and allow us to make the conclusionary judgments necessary regarding environmental qualification of this facility. Additionally, in the efforts to complete the lists, incorporate plant changes and complete data entries, mistakes in the list were observed and corrected.

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The SSER requests our review of the Equipment Qualification Program to establish that all data reported is applicable. We have reviewed the program. As discussed above, system reviews were conducted to improve and verify the equipment lists. Computer programs were developed and used to assure that other programs had communicated properly in the generation of lists, and checking and reviewing were emphasized activities in conduct of activities leading to this document. We can state that significant effort has been exerted to correct the data and we judge that there are no significant omissions or errors.

On June 27, 1983 our Architect-Engineer identified four main steam system pressure switches which were recently added to the plant design in response to NRC requirements and belong within the scope of our qualification program but were not discussed in these documents. This situation is highlighted here because of our responsibility to be open with you and also to make a point. We expect that minor changes will continue to be made in the list and qualification program. All such changes are addressed by our qualification efforts. At the time of fuel load, we expect to be able to judge the plant properly qualified. Last moment changes are expected. We know they must be addressed and require qualification documentation. We believe such changes are a reality and must be taken into account in our operation and your evaluation of this qualification process.

The SSER directs us to submit the results of our review for all safety-related mechanical (SRM) equipment located in a harsh environment. Our SRM program addresses all active safety-related mechanical equipment in a harsh environment. The results of our review are included in this Environment Qualification Report.

As the NRC is aware, the Supply System has an independent Verification Program underway. The Equipment Qualification Program was reviewed and errors were found in the calculated profiles associated with high energy line breaks (HELB). We have calculations underway correcting the errors. Where this document shows equipment status as qualified, it is qualified to LOCA and "old" HELB environments. Preliminary calculations show that most of the HELB profiles will not change significantly. Therefore, it is our judgment that most equipment will remain qualified to the

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revised HELB profiles when they are available and have been evaluated. We will provide verification of this judgment with the supporting document revisions as soon as we can, and certainly by July 30, 1983, to minimize the pressure on your review.

We are available to discuss these documents with the staff.

Very truly yours,



G. D. Bouchey, 340
Manager, Nuclear Safety and Regulatory Programs

GDB:KRW:st

Attachment

cc: Mr. R. Auluck, NRC
Mr. W. S. Chin, BPA
Mr. A. Toth, NRC, Site