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 SCHWENCER, A. Licensing Branch 2

SUBJECT: Restates util commitment to install diesel starting air
 dryers at first refueling outage, not by fuel load.
 Installation unnecessary at fuel load to complete safe
 reliable station.

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Washington Public Power Supply System

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September 14, 1983
G02-83-828

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
ADDITION OF DIESEL STARTING AIR DRYERS

- References:
- a) Letter, G02-83-140, G. D. Bouchey (SS) to A. Schwencer (NRC), same subject, dated February 14, 1983
 - b) WNP-2 Final Safety Analysis Report, Amendment No. 26, page 040.086-1, submitted July 1982
 - c) Letter, G02-82-181, G. D. Bouchey (SS) to A. Schwencer (NRC), "Submittal of SER Open Issues", dated February 16, 1982
 - d) Letter, G02-82-151, G. D. Bouchey (SS) to A. Schwencer (NRC), "Submittal of SER Open Issues", dated February 5, 1982

As stated in a phone conversation on August 25, 1983, with Messrs. R. Auluck and R. J. Giardina of your staff and Messrs. P. L. Powell and J. C. Mowery (SS), the NRC staff has considered the Supply System to be committed to providing the subject air dryers by fuel load. As indicated in the referenced submittals a), b), c) and d), the Supply System has not committed to this condition. References b) and c) state a commitment for installation by commercial operation. In scheduling efforts on this system, the Supply System has continued to use the installation by first refueling rather than commercial operation as stated in references b) and c). Reference a) (February 1983) indicated a discrepancy in NUREG-0892 with regard to this subject and requested confirmation of the Supply System position (reference d, deferred until the first refueling outage). Until the August 25, 1983 phone conversation mentioned above, the Supply System had not received a staff position on this confirmation request.

A. Schwencer

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ADDITION OF DIESEL STARTING AIR DRYERS

As indicated in Reference a), the Supply System has considered the installation of air dryers to provide "additional assurance" that moisture will be eliminated. The primary methods and design features for eliminating moisture are described in reference a) as:

- o Heated (minimum 70°F) temperature controlled room for air supply to the dryers,
- o Pressure reducing valves (250 to 210 psi) which will cause any moisture passing through them to remain as vapor since lower pressure air will hold more moisture,
- o Daily operation of low point drains and air receiver drains.

It is these design and operating methods that lead to the Supply System decision that air dryer addition did not represent a significant increase in the reliability of the air starting system. This rationale supported the February 5, 1982 position to install by first refueling outage. At that time, it was recognized that Supply System resources needed to be conserved to meet fuel load in the most efficient, cost effective manner possible. Any system changes recognized by the Supply System as essential to completing a safe, reliable generating station were emphasized, scheduled and resource allocated. Air dryer installation, because of the design and operating features described above was not considered necessary for completion of a safe, reliable generating station. For this reason, deferral of the air dryers has been the Supply System position since February 5, 1982.

Considering the present state of plant completion and the original rationale for deferral of the air dryers, the Supply System position for installation at the first refueling outage is valid. At this point in plant completion, procurement and installation of the air dryers by fuel load or commercial operation will affect the present schedule of fuel load and continued plant operation.

Your attention and consideration of this position is requested at the earliest possible date. Please contact Mr. P. L. Powell, Acting Manager, WNP-2 Licensing, upon completion of your review.

Very truly yours,



G. C. Sorensen, Acting Manager
Nuclear Safety and Regulatory Programs

PLP/tmh

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

OCONEE NUCLEAR STATION

Operating Status Report

1. Personnel Exposure

For the month of July, 28 individual(s) exceeded 10 percent of their allowable annual radiation dose limit with the highest dose being 2.410 rem, which represents approximately 20.1% of that person's allowable annual limit.

2. The total station liquid release for July has been compared with the Technical Specifications annual value of 15 curies; the total release for July was less than 10 percent of this limit.

The total station gaseous release for July has been compared with the derived Technical Specifications annual value of 51,000 curies; the total release for July was less than 10 percent of this limit.