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 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME AUTHOR AFFILIATION
 SORESENSEN, G.C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Forwards response to 830907 request for addl info re
 setpoint methodology, Resolution of issue generically w/NRC-
 recognized util group presently addressing issue requested.

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Washington Public Power Supply System

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

September 23, 1983
G02-83-865

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
SETPOINT METHODOLOGY

- References:
- 1) Letter, A. Schwencer (NRC) to D. W. Mazur (SS),
"WNP-2 Request for Additional Information",
dated September 7, 1983
 - 2) Letter, J. J. Stefano (NRC) to R. Boyd (KMC),
"Report of July 14, 1983 Meeting with General
Electric and the BWR Owners on Instrument Setpoint
Methodology", dated July 22, 1983
 - 3) Letter, D. L. Holtzscher (Illinois Power Company)
to J. J. Stefano (NRC), "Instrument Setpoint
Methodology Program", dated September 9, 1983

The reference letter stated that the Supply System had "not demonstrated the acceptability of the methodology used to combine and account for instrument channel errors in establishing the trip setpoints and allowable values that appear in the proposed (WNP-2) Technical Specifications". The setpoint methodology employed by the WNP-2 A/E (Burns & Roe) has been approved by ICSB during the Proof and Review process. For those setpoints provided by GE, the Supply System recognizes this issue as generic, common to all plants with General Electric as the nuclear steam system supplier. The methodology, setpoints, and allowable values are initially provided by General Electric to all BWR plants. In considering the extent to which the General Electric methodology has been and is being applied, it is inappropriate for the Supply System to assume the responsibility for demonstrating the acceptability of the GE setpoint methodology.

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A. Schwencer
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SETPPOINT METHODOLOGY

Attachment 1 is the Supply System response to enclosure 1 of reference 1. As demonstrated in reference 2, the NRC has recognized the Licensing Review Group's (LRG) generic effort to approach the concerns stated in enclosure 2 of reference 1. Reference 3 provides information on this generic approach and provides the schedule for the generic approach. Enclosure 2, reference 1, proposes a Licensing Condition of 6 months on WNP-2 to provide the information resulting from the LRG effort. In light of this generic effort, of which the Supply System will participate, it is not realistic on a cost-efficiency basis to require the Supply System to meet an arbitrary schedule that may conflict with that identified by the LRG. The Supply System requests that WNP-2 be able to resolve this issue generically with the NRC recognized utility group presently addressing this issue. The schedules should be based on the generic schedule proposed by the LRG.

Should you have any further questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



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

PLP/tmh
Attachment

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



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ATTACHMENT

Reference 1, Enclosure 1, points out that "...the trip setpoints are derived from the allowable values by taking into account sensor drift and trip unit drift." Typically, the WNP-2 instrument trip channels do not have trip units associated with them. WNP-2 interprets the use of "trip unit" as that which is similar to GE's testability package which is not in our design.

WNP-2's trip systems typically entail a sensor and a relay device to makeup a single trip channel. WNP-2's functional tests use a testing technique which verifies the primary sensor setpoints in conjunction with verification of proper relay contact operation. Therefore, sensor drift is being tested and must be taken into consideration. Those systems which have a non-typical configuration, such as temperature sensing channels, have drift allowances based only on the electronics portion of the sensing unit. No drift allowance is specified for the sensor elements.

The only exception now evident to WNP-2 is the scram discharge volume instrumentation. Four (4) scram discharge volume trip channels utilize a trip unit in their circuitry. The 31-day functional test has not been written or approved; however, it is WNP-2's intention to write a functional test that will inject a signal at the primary sensor not the trip unit. The existing Technical Specification value is predicated on information from GE, which does not specify drift tolerances for each piece of equipment in the trip channel. Therefore, the technique we employ to test the equipment will strive to apply consistency in our testing philosophy.

WNP-2 feels the information included herein fulfills the requirements for Request for Additional Information, No. 031.142, Enclosure 1 to Reference 1.