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ACCESSION NBR:8310170495 DOC.DATE: 83/10/10 NOTARIZED: NO
 FACIL:50-000 Generic Docket
 50-387 Susquehanna Steam Electric Station, Unit 1, Pennsylv
 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe
 AUTH.NAME AUTHOR AFFILIATION
 SORENSEN,G.L. Washington Public Power Supply System
 RECIP.NAME RECIPIENT AFFILIATION
 SCHWENCER,A. Licensing Branch 2

DOCKET #
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SUBJECT: Request that NUREG-0123, "Std BWR Tech Specs," be revised to previous format, based on need to provide adequate time frame for completion of WPPSS-2 power ascension testing program. Susquehanna test duration data encl.

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NOTES:1cy NMSS/FCAF/PM. LPDR 2cys.

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Washington Public Power Supply System

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

October 10, 1983

G02-83-900

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Docket No. 50-~~297~~

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
EXEMPTION REQUEST TO NUREG-0123, STANDARD
BWR TECHNICAL SPECIFICATIONS

Reference: WNP-2 Technical Specification, LCO 3.10.5,
Oxygen Concentration

The present requirement in the referenced LCO permits inerting of the primary containment to be suspended for 6 months. The bases is to provide access to primary containment during the Power Ascension Testing Program (PATP). An earlier revision to NUREG-0123 required inerting following 120 Effective Full Power Days. A copy of the previous/desired LCO is attached.

The request is based upon similar requests and approvals received by recently licensed plants and the need to provide an adequate time frame for completion of the WNP-2 PATP. The average PATP period for the last nine (9) domestic BWR startups is approximately 330 days. The shortest being 190 days. Based on past experience, the 6 months is clearly an unrealistic requirement.

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A. Schwencer

Page Two

October 10, 1983

EXEMPTION REQUEST TO NUREG-0123, STANDARD BWR TECHNICAL SPECIFICATIONS

Also attached is a copy of the test duration data provided in a Susquehanna Startup Test Program Report. It may be useful in substantiating the need to revise NUREG-0123 to return to the previous format.

For any additional information, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



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

MRW/tmh
Attachments

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

SUSQUEHANNA UNIT I STARTUP TEST PROGRAM

DURATIONS FROM START OF FUEL LOADING TO KEY EVENT

KEY EVENT	SUSQUEHANNA UNIT I	INDUSTRY EXPERIENCE *		
		Average	Longest	Shortest
End Fuel Loading	12	14	27	7
Start Reactor Heatup	45	48	63	26
Reach Rated Rx Temp & Pres	55	69	90	38
End 25% Power Testing	115	110	144	73
End 50% Power Testing	155	145	203	112
End 75% Power Testing	173	179	258	131
End 100% Power Testing**	254	330	447	190

DURATIONS OF MAJOR TEST PLATEAUS

MAJOR TEST PLATEAU	SUSQUEHANNA UNIT I	INDUSTRY EXPERIENCE *		
		Average	Longest	Shortest
Fuel Loading	12	14	27	7
Heatup Preparations	33	34	55	16
Heatup to Rated Rx Temp & Pres	10	21	49	5
25% Power Testing	60	41	65	20
50% Power Testing	40	35	79	8
75% Power Testing	18	34	55	14
100% Power Testing**	81	151	264	40

* Industry Experience based on nine most recent domestic BWR Startups.

** 100% Power Testing includes Warranty Run.

