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SORENSEN,G.C. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Provides documentation of util position re reactor pressure vessel surveillance program & recently amended 10CFR50 App H.Coupon removal sys consistent w/1973 version of ASTM-E185.

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

SUBJECT: Provides documentation of util position re reactor pressure vessel surveillance program & recently approved 10CFR50 App H,Coupon removal sys consistent w/1975 version of ASME-E185.

DISTRIBUTION CODE: B001S COPIES RECEIVED:LTR __ ENCL __ SIZE:_____
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INTERNAL:	ELD/HDS2	1	0	IE FILE	1	1
	IE/DEPER/EPB 36	3	3	IE/DEPER/IRB 35	1	1
	IE/DEQA/QAB 21	1	1	NRR/DE/AEAB	1	0
	NRR/DE/CEB 11	1	1	NRR/DE/EHEB	1	1
	NRR/DE/EMEB 13	2	1	NRR/DE/MD 28	2	2
	NRR/DE/MTEB 17	1	1	NRR/DE/SAB 24	1	1
	NRR/DE/SGEB 25	1	1	NRR/DHFS/HFEB10	1	1
	NRR/DL/ORAB 32	1	1	NRR/DL/SPLB	1	0
	NRR/DSI/ASB 20	1	1	NRR/DSI/CPB 10	1	1
	NRR/DSI/ICSB 16	1	1	NRR/DSI/METB 12	1	1
	NRR/DSI/PSB 19	1	1	NRR/DSI/RAB 22	1	1
	NRR/DST/RSB 23	1	1	REG FILE 04	1	1
	RGN5	5	3	RM/DDAMI/MIB	1	0
EXTERNAL:	ACRS 41	6	6	BNL(AMDTS ONLY)	1	1
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Washington Public Power Supply System
P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

October 14, 1983
G02-83-923

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
WNP-2 REACTOR VESSEL MATERIAL SURVEILLANCE PROGRAM

Reference: WNP-2 Technical Specification, LCO 3/4.4.6.1

The purpose of this letter is to document the Supply System position with regards to the WNP-2 Reactor Pressure Vessel Surveillance Program and the recently amended 10CFR50 Appendix H. The Supply System has determined the present surveillance program, accepted under the previous Appendix H, remains adequate and complies with the intent of the rule change which became effective July 26, 1983.

The amended 10CFR50 Appendix H does not change the intent of the program; rather, the change updates the law to make it consistent with current technology and pertinent national standards. The program requirements are now found in ASTM-E185-82. The three key changes to Appendix H address the inservice inspections of surveillance coupon holder bracket welds, method of determining RT_{NDT} and data reporting requirements. All three changes are now covered in either the WNP-2 ISI Program or RPV Surveillance Program.

Another issue related to Tech Specs needs further clarification, that being the interpretation of the ASTM-E185 under which the WNP-2 Surveillance Program is required to be in compliance. As stated in the amended Appendix H, paragraph B.1,

B001
1/0

> "That part of the surveillance program conducted prior to the first capsule withdrawal must meet the requirements of the edition of ASTM-E185 that is current on the issue date of the ASME code to which the reactor vessel was purchased. Later editions may be used, but including only those editions through 1982. For each capsule withdrawal after July 26, 1983, the test procedures and reporting requirements must meet the requirements of ASTM-E185-82 to the extent practical for the configuration of the specimens in the capsule."

The Supply System interprets this to mean that WNP-2 is required to comply with the ASTM-E185 version current in summer of 1972, which is the code date for the vessel. Because this code date predates any ASTM-E185, the WNP-2 Surveillance Program requirements used the accepted industry practice at that time. After 1973, the WNP-2 Surveillance Program requirements were revised to the extent practical for compliance with ASTM-E185-73. All exemptions to the requirements have been previously approved by the NRC. Furthermore, the coupon removal schedule is consistent with the 1973 version of ASTM-E185, which complies with the amended Appendix H.

Additionally, it must be recognized that the changes to Appendix H were made to respond to the current problems with irradiation embrittlement in the pressurized water reactors. As a boiling water reactor, WNP-2 EOL fluence is two orders of magnitude lower than the most conservative estimate for the PWR. Using Regulatory Guide 1.99 Revision 1, the predicted shift to the RT_{NDT} at 8 EFPY is at the lower limit of being detectable from the expected scatter.

Acceptance of this position will cause the withdrawal time presented in the referenced LCO, Table 4.4.6.1.3-1 to remain at 8 and 24 EFPY for capsule 1 and 2, respectively, with capsule 3 in standby. Should any further discussion on compliance with the amended Appendix H be necessary, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

GC Sorensen

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

RBD/tmh

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