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 SCHWENCER, A. Licensing Branch 2

SUBJECT: Suggests rev to SSER4, NUREG-0892, Backup emergency operations facility (EOF) located 9.5 miles from plant. Facility should be referred to as location rather than backup EOF.

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 WASHINGTON PUBLIC POWER SUPPLY SYSTEM  
 RECIP: 8401240165  
 LICENSED BRANCH 5

SUBJECT: Suggests rev to 225KVA, 400V-080S, backup emergency operations  
 facility (EOP) located at 2, 2 miles from plant. Facility should  
 be referred to as location rather than backup for.

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## Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

Docket No. 50-397

January 19, 1984

G02-84-31

8401240162 840119  
PDR ADOCK 05000397  
E PDR

Mr. A. Schwencer  
Licensing Branch No. 2  
Division of Licensing  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Schwencer:

Subject: WNP-2 ALTERNATE LOCATION OF CERTAIN EOF FUNCTIONS

- Reference:
- 1) NUREG-0892, "Safety Evaluation Report, WNP-2", Supplement 4, December 1983
  - 2) Letter, DG Eisenhut to DW Mazur, "Back-up Emergency Operations Facilities (EOF)", October 7, 1983
  - 3) IOM for all Operating Reactor and Licensing Branch Chiefs from S. Ramos, Subject "Modification of the Location and Habitability Criteria for Emergency Operations Facilities" October 16, 1981
  - 4) Transcript of Commission Meeting (Open Portion), "Discussion/Possible Vote on Full Power Operating License for San Onofre - 3", September 16, 1983, Tayloe Associates

In Reference 1, Section 13.3.2.2, second paragraph, the staff states "The applicant has also established an alternate EOF in WPPSS Headquarters in Richland, Washington, 9.5 miles from the site." In the next sentence, they cite a letter from D. G. Eisenhut (Reference 2), which found the location of "an alternate EOF" to be acceptable. I believe that the wording "alternate EOF" may present a misunderstanding regarding the use of the Headquarters facility. In actuality, Mr. Eisenhut stated to the Supply System "... the Commission finds your position acceptable with regard to establishing ... an alternate location in the Supply System's Headquarters located 9.5 miles from the site in Richland, Washington." (Emphasis added).

Reference 3 sets forth criteria whereby a utility can have an EOF within 10 miles of a plant, and not have a back-up EOF, if two conditions are met. The first condition, for our EOF, is a protection factor of 25; our EOF greatly exceeds this. The second condition is that the utility provide a "location more than 10 miles from the plant where licensees EOF personnel can meet with offsite officials when conditions are such that they are unable to reach the EOF." (Emphasis added). It is notable that this facility is referred to as a "location", and not as a "back-up EOF". The Supply System Headquarters meets this second condition with the minor exception of being 9.5 mi from the plant rather than "more than 10 mi". In addition, this use of a headquarters complex is similar to that approved by the Commission in the case of San Onofre - 3. (Reference 4)

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Mr. A. Schwencer

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WNP-2 Alternate Location of Certain EOF Functions

In light of the foregoing, I feel that it would be appropriate to revise the SSER 4 (Reference 1) so that later there will not be a misunderstanding as to the intended use of the Headquarters as our alternate location.

If you have any questions, please feel free to call Mr. Pat Powell at (509) 377-2501 Extension 2298.

Very truly yours,

A handwritten signature in cursive script, appearing to read "G. C. Sorensen".

G. C. Sorensen, Manager  
Regulatory Programs



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