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

SUBJECT: Provides addl info in support of 831215 request for amend to
 License NPF-21, extending Special Test Exception 3/4.10.5,
 for remainder of power ascension test program.

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Washington Public Power Supply System

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

June 15, 1984
G02-84-398

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 PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR
AMENDMENT, SPECIAL TEST EXCEPTION 3/4.10.5,
OXYGEN CONCENTRATION (SUPPLEMENTAL INFORMATION)

- References:
- 1) Letter, T. M. Novak (NRC) to G. C. Sorensen (SS),
"WNP-2 Request for Exemption From 10 CFR 50.44
Regarding Containment Inerting", dated December 15,
1983
 - 2) Letter, G02-84-298, G. C. Sorensen (SS) to A.
Schwencer (NRC), same subject, dated May 11, 1984

In further support of the Supply System request to extend the subject Special Test Exception essentially for the remainder of the WNP-2 Power Ascension Test Program (PATP), the following additional information is provided.

- 1) WNP-2 can continue to operate safely during the remainder of the Power Ascension Test Program without inerting the primary containment because the core fission product inventory is being generated at a lower rate than if the testing had been completed in the 6 months contemplated by the regulations (10 CFR 50.44). The total core inventory at the completion of the PATP will be essentially the same as if the testing had been completed in 6 months.

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SPECIAL TEST EXCEPTION 3/4.10.5, OXYGEN CONCENTRATION
(SUPPLEMENTAL INFORMATION)

- 2) No significant hazards will be created by allowing the Supply System an extension of time in which to complete the PATP without inerting. On the contrary, this will allow completion of the program goals in a safe and orderly manner without the operational hazards an inerted containment represents. If the exemption is granted, the plant staff will not be unnecessarily exposed to extreme personal danger (potentially inerted atmosphere).
- 3) This request is in the public interest of the citizens of the Pacific Northwest, as well as the surrounding areas who receive their power from or through the Federal Government (Bonneville Power Administration). A significant amount of time and resources would be required if such an extension were not granted.
- 4) The Supply System is not seeking exemptions from any normal operating requirements, nor is there anything unusual in this request. Reference 1 states that "this requirement recognizes a long established staff policy to permit the operation of BWR plants with non-inerted containments during start-up-testing. The high frequency of containment entries during this period of plant operations makes it impractical to operate with an inerted containment." (Emphasis added)

While the regulation (10 CFR 50.44) seems to presume that startup testing will be completed within 6 months after initial criticality, actual experience for the last 9 domestic BWR's indicates that the average time is approximately 300 days.

As indicated in reference 2, no significant hazards nor unreviewed safety questions will result from this change.

If we can assist you further in your evaluation of our request, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

Carl Van Hoff for GCS

G. C. Sorensen, Manager
Regulatory Programs

HLA/tmh

cc: R AuLuck - NRC
WS Chin - BPA
AD Toth - NRC Site

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