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

SUBJECT: Advises that review of reactor vessel water level instrumentation in response to NUREG-0737, Item II.F.2 & Generic Ltr 84-23 completed. License Condition 9 re inadequate core cooling instrumentation analysis satisfied.

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Washington Public Power Supply System

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November 27, 1984
G02-84-617

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

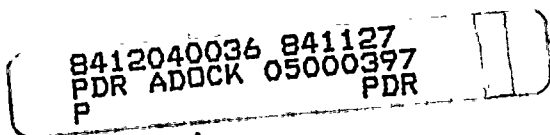
Dear Mr. Schwencer:

Subject: NUCLEAR PLANT NO. 2
REACTOR VESSEL WATER LEVEL INSTRUMENTATION,
LICENSE CONDITION (9) AND RESPONSE TO
GENERIC LETTER 84-23

- References:
- 1) Letter, D. G. Eisenhower (NRC) to All Boiling Water Reactor (BWR) Licensees of Operating Reactors, same subject, dated October 26, 1983 (Generic Letter 84-23)
 - 2) WNP-2 Operating License NPF-21, Licensing Condition (9), Inadequate Core Cooling (ICC) Instrumentation Analysis

In reference 1) the NRC staff provided two areas of improvement categories which, if implemented, would satisfy NUREG-0737, Item II.F.2. The categories are improvements that would reduce level indication errors caused by high drywell temperature, and mechanical level indication replacement based on operating experience. The Supply System has reviewed these areas and concluded that the requirements are satisfied based on the following:

- o As stated in reference 1), "those plants for which the (reference leg) vertical drop in the drywell has already been minimized will not have to make additional changes for the drywell heating effect". The WNP-2 design reference leg drop of 11 1/4 inches is an acceptable minimum. No additional changes to the WNP-2 design are necessary and high drywell temperature effects on level indication are satisfied by the present design.



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REACTOR VESSEL WATER LEVEL INSTRUMENTATION, LICENSE CONDITION (9) AND
RESPONSE TO GENERIC LETTER 84-23

- o Reference 1) also states that mechanical level indication equipment should be replaced with analog level transmitters unless operating experience confirms high reliability of the mechanical equipment. To date, experience with the mechanical level indication equipment on WNP-2 has shown the equipment to be reliable within design. With a reliably operating system there is no impetus for replacement. There is every indication that the mechanical level indication equipment on WNP-2 will continue to operate reliably. Replacement at this time is not warranted. Also, during any loss of power condition, mechanical level instrumentation is preferred.

Additionally, reference 2) stipulates that "the licensee shall implement staff's requirements regarding additional instrumentation for detection of inadequate core cooling which may result from the staff's review of the BWR Owners' Group Reports (SLI-8211 and SLI-8218) . . .". As shown above, the present reference leg design and the mechanical level instrumentation equipment operating experience satisfy the staff's requirements and do provide the instrumentation to detect inadequate core cooling required by NUREG-0737, Item II.F.2. Accordingly, the Supply System considers Licensing Condition (9) to the WNP-2 Operating License, NPF-21, to be satisfied.

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

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh

cc: R Auluck - NRC
WS Chin - BPA
D Willet - NRC RV
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