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SORENSEN,G.C. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
BUTLER,W.R. Licensing Branch 2

SUBJECT: Requests that 850516 application to amend License NPF-21, revising Tech Specs for automatic depressurization sys logic mods,License Condition 18,be processed on exigent basis to avoid startup delay.

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May 29, 1985
G02-85-275

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Butler:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR TECHNICAL SPECIFICATION AMENDMENT UNDER EXIGENT CIRCUMSTANCES

Reference: Letter, G02-85-251, G. C. Sorensen (SS) to W. R. Butler (NRC), "Request for Amendment to Technical Specifications for Automatic Depressurization System (ADS) Logic Modifications, License Condition 18", dated May 16, 1985

The referenced letter requested an amendment to the WNP-2 Technical Specifications for the Automatic Depressurization System (ADS) Logic Modifications, License Condition 18. In it the Supply System advised the NRC that approval of the amendment was necessary by June 21, 1985 if plant start-up on that date was to be achieved. It was also requested that if the NRC is unable to complete its review and approval process by that date through the normal procedures contemplated by 10 CFR 50.91 and 50.92, it process the requested amendment on an exigent basis, in accordance with Section 50.91(a)(6).

Because the normal review process includes publication in the Federal Register followed by a thirty day comment period, it is now apparent that insufficient time exists to follow such procedure without delaying reactor start-up. Accordingly, we request that the amendment request be processed on an exigent basis as is authorized by Section 50.91(a)(6).

As discussed in the referenced letter, the Supply System believes that specific approval of the requested changes in plant Technical Specifications is not required in advance of their implementation because the plant modifications necessitating those changes have already been approved in License Condition 18 by the Staff. Promptly after the Supply System became aware that members of

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the NRC Staff questioned this position, the Supply System elected to submit the May 16, 1985 amendment request. This was done to avoid any delay in start-up, which is necessary if WNP-2 is to be on line in time to offset the decrease in hydroelectric capacity resulting from the end of the spring runoff period. Startup by June 21 is necessary if commercial operation is to be resumed on July 1.

In addition to these exigent circumstances, the requested amendment is not controversial and the hardware changes necessitating the amendment have, in fact, been subject to considerable technical review by the NRC Staff. Moreover, the same Technical Specification change being requested by the Supply System has been published in the Federal Register on the Duane Arnold Docket and the Staff approved the change for that facility in Amendment 110 to DPR-49 dated February 1, 1985. No public comment was received on the requested amendment.

Finally, it should be noted that the Supply System has implemented License Condition 18 well before the period when it was required to be completed. As a result, the operation of WNP-2 will be even more conservative than that required by the NRC.

Accordingly, the Supply System requests that the NRC process its May 16, 1985 Technical Specification amendment request on an exigent basis so as not to impact start-up on June 21. We are prepared to provide whatever support is necessary to assist you in this task. Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

GC Sorensen

G. C. Sorensen, Manager
Regulatory Programs

HLA/tmh

cc: JO Bradfute - NRC
WS Chin - BPA
JB Martin - NRC RV
E Revell - BPA
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