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 RECIP. NAME: BUTLER, W.R. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Forwards addl info re util 831118 response to Generic Ltr
 83-28 re reactor trip sys, per NRC 850319 request for addl
 info.

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 TITLE: OR/Licensing Submittal: Salem ATWS Events GL-83-28

NOTES: 05000397
 OL: 12/20/83

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Washington Public Power Supply System

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May 17, 1985
G02-85-257

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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:

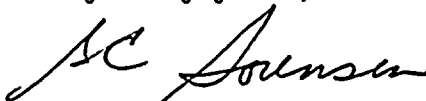
Subject: NUCLEAR PLANT NO. 2
GENERIC LETTER 83-28, ADDITIONAL INFORMATION

- References:
- 1) Letter, G02-83-1076, G. C. Sorensen (SS) to A. Schwencer (NRC), "Nuclear Project No. 2, Response to Generic Letter 83-28", dated November 18, 1983
 - 2) Letter, A. Schwencer (NRC) to G. C. Sorensen (SS), "Request for Additional Information - Preliminary Staff Review of Generic Letter 83-28 Responses, WNP-2", dated March 19, 1985

Reference 1 provided the WNP-2 response to the Salem ATWS Generic Letter 83-28. Preliminary review by the Staff, Reference 2, resulted in a request for additional information; accordingly, the attached additional information is provided.

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

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh
Attachments

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

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Item 2.1 (Part 1) - Incomplete

Applicant needs to confirm that components needed to perform reactor trip are identified as safety-related on all documents and in information handling systems.

WNP-2 Response:

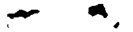
Reactor Trip System components (and all other safety related components) defined in the Generic Letter 83-28 position statement 2.1 are confirmed to be included on the WNP-2 Class IE (C1E) or Safety Related Mechanical (SRM) lists which are a subset of the Master Equipment List (MEL). The C1E and SRM lists were developed by the AE utilizing a process that systematically reviewed plant documentation and drawings against a specific criteria as described in response to 2.2.1.1 (Reference 1) for identifying safety related components. This review was conducted to assure that all safety related components including those required to trip the reactor were properly identified.

In addition, the following documents and information handling system classify the document as either Safety Related or Quality Class 1 (QC1).

- o Electrical Wiring Diagrams (EWD) - Identifies the Reactor Trip System as Safety Related.
- o Vital One Line Diagrams - Identifies those portions of the Reactor Trip System that are classified as QC1.
- o Connection Wiring Diagrams - Identifies those portions of the Reactor Trip System that are classified as QC1.
- o System Design Specification - Specifies IEEE 279-1971 as the design criteria for the Reactor Trip System.
- o Purchased Parts Drawings - Which specified the original components for the Reactor Trip System were either classified as essential or safety related.
- o Interconnection Wiring Pull and Termination Slips - Classified Class 1 for the Reactor Trip System.

Additionally, as described in response to 3.1.2 (Reference 1) no CVI information is implemented on a stand-alone basis, but rather as a part of a pre-approved, controlled, plant procedure, maintenance work request and work package. In each case, the controlling document denotes the safety relatedness of the action (use of CVI data) with QC applied as required.

In summary, the top level control documents for identification of all safety related components is MEL with its subset C1E and SRM lists with changes to these subsets controlled by the WNP-2 design change process.



THE
UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D. C. 20250

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Item 2.2.1 - Incomplete

Applicant needs to respond to sub-item 6 regarding classification of equipment important to safety.

WNP-2 Response:

With respect to the equipment classification program in use at WNP-2 for structures, systems and components important to safety, the Supply System is closely monitoring the AIF and the Utility Safety Classification Group activities directed towards seeking a generic resolution to the Staff's concern in this regard. The Supply System does not agree that plant structures and components important to safety constitute a broader class than the safety related set. Furthermore, the Supply System position is that non safety related plant structures, systems and components have been designed, and are maintained, in a manner commensurate with their importance to the safety and operation of the plant.

Item 2.2.2 and 2.1 (Part 2) - Incomplete

Applicant needs to describe revisions to his vendor interface program to make it address all the concerns of Item 2.2.2. In this regard, applicant should note that the staff found the NUTAC program fails to address the concern about establishing and maintaining an interface between all vendors of safety-related equipment and the utility.

WNP-2 Response:

The Supply System has established, implemented and is maintaining a Contractor/Vendor Information (CVI) file system to insure that vendor information received by WNP-2 for safety related components is controlled and available for use throughout the life of the plant.

The CVI file was created initially during the construction/procurement phase of the plant and is a file which is indexed on equipment part numbers controlled in MEL. MEL provides direct reference to a CVI file item which contains pertinent engineering, test, or maintenance information that was obtained during procurement or construction. Typically, this information is contained in what is called an Operating and Maintenance Manual. These manuals, or documents containing similar information, are filed in CVI with a stamp reading "Verify Before Use". This is done to provide additional assurance that the best, current information be obtained and utilized prior to actual performance of work on a piece of equipment.

The CVI file has undergone extensive review by plant system engineers, Operations and Maintenance personnel to ensure the technical information received from the vendors is accurate with regard to the WNP-2 specific installation. As a result of equipment qualification inquiries and data collection coupled with spare parts and corrective maintenance contacts with vendors, virtually all safety related equipment has the latest documentation and updates (bulletins) available. Each update has been reviewed and screened for WNP-2 applicability before insertion into the CVI system. All plant personnel have been encouraged to solicit from vendor contacts any pertinent information available for potential integration into CVI.

For safety related components that are no longer manufactured, no longer manufactured under 10 CFR 21 or whose manufacturer is out of business, a three-fold program is in place to:

1. Identify a qualified equivalent component
2. Contact other utilities for replacement/maintenance information
3. Appraise maintenance of all special consideration.
4. Provide for implementation of resultant changes by our design change process.

It is important to note that the best, current information is attained through several sources, only one of which is directly from a vendor. Our response to Item 3.1.2 (Reference 1) provides an integrated perspective on the actual process utilized at WNP-2.

We are also an active member of the INPO NUTAC on vendor interface. Based on NUTAC's final draft report, WNP-2's implementation of NPRDS and active participation in the programs discussed in Item 3.1.2 (Reference 1), the Supply System vendor interface program is meeting or exceeding NUTAC's guidance.

Item 4.5.3.- Incomplete

Applicant needs to submit information showing that their current intervals will result in high reactor trip system availability when considering the concerns expressed in sub-items 4.5.3.1 to 4.5.3.5. Proposed Technical Specification changes resulting from this review shall be submitted for staff review.

The staff finds that modifications are not required to permit on-line testing of the backup scram valves. However, the staff concludes that testing of the backup scram valves (including initiating circuitry) as a refueling outage frequency, in lieu of on-line testing, is appropriate and should be included in the technical specification surveillance requirements. The licensee needs to address this conclusion.

WNP-2 Response:

The Supply System has reviewed the BWR Owners' Group submittal NEDC-30844, hereby endorses the report, and, as directed by the Staff in Reference 2, intends to provide a response to Item 4.5.3 within 90 days after NRC issuance of the Staff's evaluation of NEDC-30844.

