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 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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 SORESENSEN, G.C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 BUTLER, W.R. Licensing Branch 2

SUBJECT: Provides further justification for 850529 request that
 850516 application for amend to License NPF-21 re automatic
 depressurization sys logic mods be processed under exigent
 circumstances.

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1. The first part of the report discusses the general situation of the company and the results of the survey. It also mentions the fact that the company has been operating for a long time and has a good reputation.

2. The second part of the report discusses the specific results of the survey. It mentions that the majority of the respondents are satisfied with the company's performance and that they believe the company is doing a good job.

3. The third part of the report discusses the recommendations of the survey. It suggests that the company should continue to improve its performance and that it should pay attention to the needs of its customers.

4. The fourth part of the report discusses the conclusions of the survey. It states that the company is doing well and that it has a good future. It also mentions that the survey was a success and that the results are reliable.

5. The fifth part of the report discusses the appendix. It contains a list of the respondents and a copy of the survey questionnaire.

Washington Public Power Supply System

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

May 31, 1985
G02-85-286

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:
REASON FOR EXIGENCY

- Reference: 1) Letter, G02-85-275, G. C. Sorensen (SS) to W. R. Butler
(NRC), Same Subject, dated May 29, 1985
- 2) 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 Modifi-
cations, License Condition 18", dated May 16, 1985

Reference 1) requested that the subject amendment (ADS Logic Modification) be processed on an exigent basis as authorized by Section 50.91(a)(6). The purpose of this letter is to provide further justification for a finding of exigent circumstances.

During the May 8, 1985 Plant Operation Committee (POC) meeting, the Plant Modification Request for the inhibit switch installation was discussed. Installation of the inhibit switch is part of a plant modification involving a change in the ADS logic authorized by NRC in connection with License Condition 18. At that meeting a question was raised as to whether the Region V Resident Inspector agreed with the Supply System position that the technical specification modification ultimately requested by the Supply System in its May 16, 1985 letter (Reference 2) was not necessary in view of the Staff's prior approval of the ADS logic modification. Later that same day a follow-up discussion between the Resident Inspector and the Plant Technical Staff revealed a difference of opinion with respect to the need for the technical specification modification. Over the next few days numerous discussions were held between NRR, Region V and the Supply System. In addition, the Supply System continued internally to assess the need for the modification to plant technical specifications.

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W. R. Butler

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REQUEST FOR TECH. SPEC. AMENDMENT UNDER EXIGENT CIRCUMSTANCES: REASON FOR EXIGENCY

The Supply System also simultaneously proceeded to prepare and review internally the technical specification modification, even though no final resolution was reached as to whether the technical specification modification was required. The modification was submitted to the POC and discussed during its May 15 meeting. The following day (May 16, 1985) the modification and transmittal letter received the required approval from the Corporate Nuclear Safety Review Board. It was signed and telecopied to the NRC on the same day.

Under these circumstances the Supply System believes that it responded expeditiously and prudently as soon as a question was raised as to the need for the requested technical specification modification. In addition, as discussed in the Supply System's May 16, 1985 letter, the requested modification is not controversial. Therefore, the Supply System could gain no advantage as a result of the development of exigent circumstances. Accordingly, the Supply System requests that the Staff proceed with the necessary steps to grant this request for amendment on an exigent basis, as authorized under Section 50.91 (a)(6).

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

HLA/tmh

cc: JO Bradfute - NRC
WS Chin - BPA
C Eschels - EFSEC
JB Martin - NRC RV
E Revell - BPA
NS Reynolds - BLCP&R
AD Toth - NRC Site