

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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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: THOMPSON, H.L. RECIPIENT AFFILIATION: Division of Licensing

SUBJECT: Forwards response to Generic Ltr 85-07 re integrated schedules for plant mods. Informal integrated living schedule (ILS) will be implemented. Reservations expressed re concept of ILS.

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NOTES:

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INTERNAL:	ACRS	09	6	6	ADM/LFMB		1 0
	ELD/HDS2		1	0	NRR/DE/MTEB		1 1
	NRR/DL DIR		1	1	NRR/DL/ORAB		1 0
	NRR/DL/TSRG		1	1	NRR/DSI/METB		1 1
	NRR/DSI/RAB		1	1	REG FILE	04	1 1
	RGN5		1	1			
EXTERNAL:	24X		1	1	EG&G BRUSKE, S		1 1
	LPDR	03	1	1	NRC PDR	02	1 1
	NSIC	05	1	1			

The following information was obtained from the records of the
 Department of the Interior, Bureau of Land Management, for the
 period 1900 to 1909, inclusive, regarding the land owned by
 the United States in the State of California.

The total area of land owned by the United States in the State of California for the period 1900 to 1909, inclusive, was 1,000,000 acres.

The following table shows the distribution of the land owned by the United States in the State of California for the period 1900 to 1909, inclusive.

TABLE 1.
 Distribution of land owned by the United States in the State of California, 1900 to 1909, inclusive.

Year	Land owned by the United States in the State of California, 1900 to 1909, inclusive.	Land owned by the United States in the State of California, 1900 to 1909, inclusive.	Land owned by the United States in the State of California, 1900 to 1909, inclusive.	Land owned by the United States in the State of California, 1900 to 1909, inclusive.
1900	1,000,000	1,000,000	1,000,000	1,000,000
1901	1,000,000	1,000,000	1,000,000	1,000,000
1902	1,000,000	1,000,000	1,000,000	1,000,000
1903	1,000,000	1,000,000	1,000,000	1,000,000
1904	1,000,000	1,000,000	1,000,000	1,000,000
1905	1,000,000	1,000,000	1,000,000	1,000,000
1906	1,000,000	1,000,000	1,000,000	1,000,000
1907	1,000,000	1,000,000	1,000,000	1,000,000
1908	1,000,000	1,000,000	1,000,000	1,000,000
1909	1,000,000	1,000,000	1,000,000	1,000,000

Washington Public Power Supply System

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PDR ADDCK 05000397
P PDR

Docket No. 50-397
June 27, 1985
G02-85-346

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
Office of Nuclear Reactor Regulation
US Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Thompson:

Subject: RESPONSE TO GENERIC LETTER 85-07 IMPLEMENTATION
OF INTEGRATED SCHEDULES FOR PLANT MODIFICATIONS

Attached for your information and use is a completed copy of
Enclosure 2 from Generic Letter 85-07.

While we support the concept of an integrated living schedule (ILS), we do have reservations which we feel require discussion prior to a decision to implement an ILS. For the present, we have indicated our intent to implement an informal ILS only. We anticipate that the differences between an informal and formal ILS will be a part of any future discussions.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

Attachment

cc: JO Bradfute - NRC
WR Butler - NRC
A Toth - NRC Site
NS Reynolds - BLCP&R
C Eschels - EFSEC

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ATTACHMENT

RESPONSE TO ENCLOSURE 2 (Generic Letter 85-07)

Item B.1

Our reservations related to the implementation of a formal ILS are basically as follows:

- 1) We are concerned with including schedules in the plant operating license. Should a schedule change become necessary, even if the NRC staff agrees to the change, the license amendment process is so cumbersome as to cause concern over the ability to process the change in a timely manner. We propose that the license contain a statement that "items shall be completed on a schedule agreed to by the NRC staff". Schedule changes, if necessary, can then be negotiated outside of the license amendment process.
- 2) At the present, we do not have a large backlog of NRC required changes; thus, an informal ILS would seem to be adequate. We consider schedule commitments to be binding whether they are in the license or stated in a letter. We need to understand how the NRC views the difference between a formal and informal ILS.

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ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85-07

PLANT NAME: WNP-2

UTILITY: Washington Public Power Supply System

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS _____
- B. Have reservations that must be resolved before developing ILS X
- C. Do not presently intend to negotiate an ILS with the staff _____
- D. Plan to implement an informal ILS only X

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date for selecting a methodology: _____
Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

x

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame P. L. Powell/Early August 1985

Phone Number (509) 372-5000 Ext: 2298

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.