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SUBJECT: Submits addl info re Positions 3.1.2 & 3.2.2 of Generic Ltr 83-28, in response to A Schwencer 850506 request. Vendor, industry & engineering info reviewed in preparation for maint & test procedures. Insp findings on 850415-26 noted.

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Washington Public Power Supply System

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July 3, 1985
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PDR ADDCK 05000397
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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
NRC GENERIC LETTER 83-28, REQUEST FOR
ADDITIONAL INFORMATION

Reference: Letter, A. Schwencer (NRC) to G. C. Sorensen (SS),
Same Subject, dated May 6, 1985

The reference letter requested additional information on Positions 3.1.2 and 3.2.2 of Generic Letter (GL) 83-28 within 45 days of our receipt of same (received May 20, 1985). The purpose of this letter is to provide that information.

In the enclosure to the reference letter (Enclosure), the NRC has apparently incorrectly interpreted our response of November 18, 1983. The enclosure states: "Since your program indicates no such control or prompt incorporation is provided, please perform the checks requested by Positions 3.1.2 and 3.2.2 and submit the results within the time period specified in the cover letter". We do not believe that our response should have led to such a conclusion, but we shall attempt to alleviate your concerns herein.

Perhaps the reason for the misinterpretation of our response was the Supply System's statement in paragraph two, line four, which noted: "It should be stated here that WNP-2 does not directly use vendor information as its maintenance or test procedures". In retrospect, a more appropriate statement would have been: "While the Supply System incorporates appropriate vendor and engineering recommendations in the preparation of their test/maintenance procedures, they are not the only source of information that is utilized".

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W. R. Butler

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NRC GENERIC LETTER 83-28, REQUEST FOR ADDITIONAL INFORMATION

As previously indicated, we have been and continue to utilize vendor recommendations, engineering recommendations, industry input, and our own lengthy experience in the preparation of our Test/Maintenance PPM's. These same basic resources are revisited when changes to the PPM's become necessary. It is not unusual for the industry to become aware of problems even before the vendor does. In those cases, however, the vendor's knowledge is sought out while solving any problems encountered.

The Supply System does have controlled processes for the receipt, review, and incorporation of appropriate vendor and industry information, and we were pleased with the NRC's observation that the practices described in our previous response contribute to a sound program. We would also bring to your attention that during the period of April 15 through April 26, 1985, Region V of the NRC performed an inspection of the WNP-2 Nuclear Plant (Docket #50-397) and within Section G of that report entitled Licensee Program for Action on Operational Event Reports, it was stated that: "The inspector examined the administrative controls for review and action on reports of equipment malfunctions at other nuclear facilities. Such reports included NRC Bulletins and Information Notices, INPO event reports and manufacturer notifications of hardware deficiencies" (emphasis added). The result of this inspection was, in part, "An effective review and evaluation system appeared to be in place with review records demonstrating due consideration of generic aspects within the WNP-2 Plant."

In conclusion, with respect to Positions 3.1.2 and 3.2.2, the Supply System does in fact review vendor, industry, and engineering recommendations to ensure that any appropriate guidance is included in the test and maintenance procedures or the technical specifications, where required.

Based on this understanding, we feel that additional submittals in response to your request contained in the referenced letter are now not necessary. As is always the case, the Region has complete access to our records for purposes of verification as they deem appropriate.

Should you have any further questions regarding this matter, please call 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
JB Martin - NRC RV
NS Reynolds - BLCP&R
E Revel - BPA
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