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RECIP.NAME RECIPIENT AFFILIATION
BUTLER,W.R. NRC - No Detailed Affiliation Given

SUBJECT: Comments on 850227 application for amend to license replacing high discharge signal w/pump running input from pump breaker.Proposed changes will not solve problem. Reevaluation of proposed amend urged.

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[illegible]

[illegible] Affiliation [illegible]

NOTE: [illegible] application for [illegible] to the use [illegible]

TITLE: [illegible] General Distribution

[illegible]

Rick Gill
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June 23, 1985

NRC
1717 H. Street, N.W.
Washington D.C. 20555
Att. Walter R. Butler

WPPSS - WNP-2 application dated Feb. 27,1985

Dear Mr. Butler,

I wish to comment on the purposed amendment of the operating license for WNP-2. The revision to the specifications as listed in the Public Notice (copy attached) may neither solve the problem or be the most techincally correct solution.

The amendment "seeks to replace the high discharge signal with a pump running input taken from the pump breaker. Thus, the valve would open on low flow and breaker closed (pump running) and would close on high flow or with the breaker open." The apparent intent is to control a valve from a combination of sensing flow and the running condition of a pump.

Unfortunatly the state of a breaker (open or closed) does not usually indicate the running condition of a pump. A breaker closed indication at best may indicate that the pump is able to run. Intervening disconnect switches and starters would be able to stop (secure) the pump. The proposed system would most likely result in a control signal indicating pump running all of the time. This would probably increase the likelyhood of aggravating the orginal problem.

A better indication of pump running condidtion would be an auxillary interlock on the pump starter.

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An auxillary interlock is a device which attaches to the starter and opens and closes as the starter open and closes. The relability of the system would be enhanced by the addition of a power monitor attached to the line side of the starter giving an indication that power to operate the pump is avaliable at that point.

An alternate solution to the problem would be the addition of a current relay to monitor the the current draw of the pump. A pump drawing current indicates the pump is operating while a pump drawing zero current indicates a pump not operating.

In short I do not believe that the proposed changes will solve the indicated problem and that correct solutions have been overlooked. I would urge you to reevaluate the proposed amendment.

Yours truley,

Rick Gill

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