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 RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Discusses compliance w/10CFR50.49 & Generic Ltr 85-15-re
 environ qualification of electrical equipment &
 implementation of requirements of Rev 2 of Guide 1.97.
 Equipment subjt to 10CFR50.49 will be qualified by 851130.

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日期	姓名	性别	年龄	籍贯	职业	住址	备注
1945.12.1	王德胜	男	45	山东	农民	山东烟台	
1945.12.2	李德胜	男	45	山东	农民	山东烟台	
1945.12.3	张德胜	男	45	山东	农民	山东烟台	
1945.12.4	赵德胜	男	45	山东	农民	山东烟台	
1945.12.5	刘德胜	男	45	山东	农民	山东烟台	
1945.12.6	陈德胜	男	45	山东	农民	山东烟台	
1945.12.7	周德胜	男	45	山东	农民	山东烟台	
1945.12.8	吴德胜	男	45	山东	农民	山东烟台	
1945.12.9	郑德胜	男	45	山东	农民	山东烟台	
1945.12.10	冯德胜	男	45	山东	农民	山东烟台	
1945.12.11	马德胜	男	45	山东	农民	山东烟台	
1945.12.12	朱德胜	男	45	山东	农民	山东烟台	
1945.12.13	孙德胜	男	45	山东	农民	山东烟台	
1945.12.14	周德胜	男	45	山东	农民	山东烟台	
1945.12.15	吴德胜	男	45	山东	农民	山东烟台	
1945.12.16	郑德胜	男	45	山东	农民	山东烟台	
1945.12.17	冯德胜	男	45	山东	农民	山东烟台	
1945.12.18	马德胜	男	45	山东	农民	山东烟台	
1945.12.19	朱德胜	男	45	山东	农民	山东烟台	
1945.12.20	孙德胜	男	45	山东	农民	山东烟台	
1945.12.21	周德胜	男	45	山东	农民	山东烟台	
1945.12.22	吴德胜	男	45	山东	农民	山东烟台	
1945.12.23	郑德胜	男	45	山东	农民	山东烟台	
1945.12.24	冯德胜	男	45	山东	农民	山东烟台	
1945.12.25	马德胜	男	45	山东	农民	山东烟台	
1945.12.26	朱德胜	男	45	山东	农民	山东烟台	
1945.12.27	孙德胜	男	45	山东	农民	山东烟台	
1945.12.28	周德胜	男	45	山东	农民	山东烟台	
1945.12.29	吴德胜	男	45	山东	农民	山东烟台	
1945.12.30	郑德胜	男	45	山东	农民	山东烟台	

Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

Docket No. 50-397

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P PDR

September 30, 1985
G02-85-655

Director of Nuclear Reactor Regulation
Attention: Mr. W. R. Butler, Chief
Licensing Branch No. 2
US Nuclear Regulatory Commission
Washington, D. C. 20555

Dear Mr. Butler:

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
COMPLIANCE WITH 10CFR 50.49

Reference: Letter A. Schwencer to G. C. Sorensen, "Issuance of Amendment 8 to Facility Operating License NPF-21, WPPSS Nuclear Project No. 2", dated March 28, 1985

The subject regulation establishes March 31, 1985, or the end of the second refueling outage after March 31, 1982, whichever is earlier, as the goal for environmental qualification of electrical equipment important to safety for holders of operating licenses issued before February 22, 1983. Extension of this deadline beyond November 30, 1985, is authorized where the Commission determines that exceptional circumstances are present. For operating licenses issued after February 22, 1983, but before November 30, 1985, licensees were required to "perform an analysis to ensure that the plant can be safely operated pending completion of equipment qualification."

Generic Letter 85-15 issued by the Commission on August 8, 1985, provides additional information relating to the process for obtaining extensions of the deadline beyond November 30, 1985. Generic Letter 85-15 states in part that "It is the Commission's intention that licensees which are not in compliance on November 30, 1985, and which have not been given extensions either will have to either shutdown or, if they have valid Staff approved justification for continued operation, select to operate and face civil penalties of \$5,000 per item per day for each day after November 30, 1985, on which a licensee operates in noncompliance with the rule."

The purpose of this letter is to provide our understanding of the relationship between the above portion of Generic Letter 85-15 and the following conditions of our Operating License (NPF-21):

- (a) The licensee shall implement (installation or upgrade) requirements of R. G. 1.97, Rev. 2 with the exception of flux monitoring prior to startup following the first refueling outage.

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W. R. BUTLER
WNP-2 COMPLIANCE WIYH 10CFR 50.49
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September 30, 1985

- (b) The licensee shall implement (installation or upgrade) requirements of R. G. 1.97, Rev. 2 for flux monitoring prior to startup following the first refueling outage. (Attachment 2, Paragraphs 3(a) and 3(b) of License Condition 2.c(16))

In its safety evaluation of this License Condition (Ref. 1) the Staff noted that "Modifications required as a result of R. G. 1.97 are to be implemented on a plant specific schedule agreed to by the Staff and the licensee . . . The licensee is not requesting an exemption or deviation from either the requirements of R. G. 1.97 or the environmental qualification rule (10CFR 50.49). Therefore, a justification for continued operation (JCO) is not necessary." On the basis of information provided, the Staff found our " . . . request to defer installation of qualified SRMs until the first refueling outage (consistent with the implementation date for other R. G. 1.97 instrumentation) to be acceptable, and concluded that the existing instrumentation is acceptable for interim operation."


On the basis of the above, and in view of the fact that our Operating License was not issued until December 20, 1983, it is our understanding that:

- (1) The License Condition at issue here authorizes operation until the first refueling outage without complete qualification of a certain category of equipment referenced in the Condition;
- (2) In view of this License Condition, there is no need to file an extension request for this equipment in accordance with Generic Letter 85-15; and
- (3) Continued operation beyond November 30, 1985, in accordance with the conditions of our Operating License will not result in the assessment of civil penalties.

It is our intent that all other electrical equipment (10CFR 50.49 b(1) & b(2)) subject to the requirements of 10CFR 50.49 will be qualified by November 30, 1985.

Should your understanding of our License Conditions and the regulation be different from ours, prompt notification would be appreciated.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

cc: JO Bradfute/NRC
JB Martin/NRC RV
E Revell/BPA
NS Reynolds/BLCP&R
AD Toth/NRC Site

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