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SUBJECT: Forwards supplemental info re conformance to Reg. Guide 1, 97, Rev 2, "Emergency Response Capability," per 850809 interim rept request. No incorrect assumptions identified.

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Docket No. 50-397

October 8, 1985
G02-85-710

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
EMERGENCY RESPONSE CAPABILITY -
CONFORMANCE TO R.G. 1.97, REV. 2

References: a) Letter, W. R. Butler (NRC) to G. C. Sorensen (Supply System),
same subject, dated August 9, 1985
b) Letter, G02-85-346, G. D. Bouchey (Supply System) to
A. Schwencer (NRC), "Emergency Response Capability",
dated April 15, 1983

Reference a) forwarded an interim report evaluating the degree of conformance of WNP-2 to Regulatory Guide 1.97, Rev. 2, and noted some items requiring further clarification. Accordingly, the attached supplemental information is provided. Additionally, the reference requested the Supply System to provide additional comments if the interim report involved any incorrect assumptions or reflected a commitment beyond the intent of the previous response (Reference b). No such incorrect assumptions or commitments were identified in the review of the interim report.

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Mr. W. R. Butler
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Should you require further information, please contact Mr. P. L. Powell, Manager,
WNP-2 Licensing.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

PLP:kjt

Attachments

cc: RC Barr - BPA
JO Bradfute - NRC
JB Martin - NRC RV
E. Revell - BPA
AD Toth - NRC Site.

SUPPLEMENTAL INFORMATION PROVIDED FOR THE
REVIEW OF INEL INTERIM REPORT:

CONFORMANCE TO REGULATORY GUIDE 1.97
WASHINGTON PUBLIC POWER SUPPLY SYSTEM,
NUCLEAR PLANT NO. 2

3.3.1 NEUTRON FLUX

The Supply System is following industry development suitable for installation as Category 1 instrumentation. A specification for bid request has been issued and potential suppliers have been contacted to determine acceptability of their equipment to comply with the Regulatory Guide recommendations. The review of the proposed equipment has identified significant technical concerns still requiring resolution prior to selection. As a result, the Supply System will be requesting deferral of this requirement until completion of the second refueling outage.

3.3.2 COOLANT LEVEL IN REACTOR

The WNP-2 FSAR pages 7.5-1 and 7.5-1a, as amended in November 1984, describe the fuel range water level monitoring system which provides indication from -310" to -110", with two divisionally separated differential pressure transmitters. Therefore, the as installed components monitor from below the active fuel to +60" above the bottom of the dryer skirt. The functional level from -310" to +60" is approximately 65" less than the recommended level to the centerline of the mainsteam lines. Emergency procedure 5.1.1 (Vessel Level Control) requires controlling the level between +13" and +54.5". Therefore, for other than historical purposes, the existing level to +60" is adequate for emergency operation.

3.3.3 DRYWELL DRAIN SUMPS LEVEL

As discussed in the FSAR (page 7.6-21), the drywell sump leakage information during normal operation provides the operator with the means of determining valve leakage, pipe breaks, etc. However, during a LOCA, this information doesn't assist the operator as the containment is isolated and only the ECCS systems are operable. Also, the sump would be flooded and overflowing into the suppression pool, thereby rendering any level instrumentation data superfluous.

3.3.5 SUPPRESSION POOL WATER LEVEL

The WNP-2 FSAR page 7.5-23, as amended in November of 1984, describes the wide range and narrow range suppression pool water level monitoring system. The wide range spans from below the ECCS suction lines, to five feet above normal water level. Therefore, the system as installed, satisfies the Regulatory Guide recommendation.

3.3.7 DRYWELL ATMOSPHERE TEMPERATURE

Even though Regulatory Guide 1.97 recommends a range of 40 to 440°F, we believe that this range does not consider the design parameters of WNP-2. The WNP-2 maximum drywell design temperature (FSAR, page 6.2-20) is 340°F and the range of installed instrumentation is 50 to 400°F, thus providing for a temperature excursion of 60°F above maximum design temperature. Therefore, we believe the existing temperature range satisfies the intent of the Regulatory Guide recommendations.

3.3.9 RESIDUAL HEAT REMOVAL HEAT EXCHANGER OUTLET TEMPERATURE

Even though the RHR heat exchanger outlet temperature is classified as Category 3 rather than Category 2, the devices are mounted as Seismic Class 1 and fed from Class 1E power. Both the inlet and outlet temperature of the RHR heat exchangers are monitored, recorded, and annunciated in the control room. In addition, the RHR heat exchanger's operation is monitored by valve lineup and flow, which are displayed in the control room. Therefore, the Supply System believes the system need not be upgraded to Category 2 and is adequately monitored by adequate diverse methods to determine system operation.

3.3.10 COOLING WATER TEMPERATURE TO EFS SYSTEM COMPONENTS

The worst case Standby Service Water temperature (EFS cooling water temperature) as designed, will not exceed 95°F. (FSAR, page 9.2-28.) The existing upper range of 150°F provides sufficient margin for temperature excursion. Therefore, the Supply System believes that the installed instrument range satisfies the Regulatory Guide recommendations.

3.3.11 PLANT AND ENVIRONS RADIOACTIVITY (PORTABLE INSTRUMENTATION)

The Supply System has two portable multichannel gamma-ray spectrometers that are assigned to the emergency offsite organization. These units are deployed as necessary, to determine plant release to the environs.

