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BUTLER,W.R. Licensing Branch 2

SUBJECT: Provides supplementary response to Generic Ltr 83-28, focusing on combination of routinw procedure reviews & control of vendor info that ensures appropriate guidane in test & maint procedures or Tech Specs.

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Docket No. 50-397

October 7, 1985
G02-85-702

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,
SUPPLEMENTARY INFORMATION

Reference: Letter, G02-85-360, G. C. Sorensen (Supply System) to W. R. Butler (NRC), NRC Generic Letter 83-28, "Request for Additional Information", dated July 3, 1985

The reference letter provided additional information, as requested by the staff, with regard to Salem ATWS Generic Letter Sections 3.1.2 and 3.2.2, Post-Maintenance Testing of Reactor Trip Systems, and All Other Safety-Related Components, respectively. The following supplemental information is provided in support of the information in the reference.

While the information provided in the reference related current Supply System practices with regard to sources of information used in maintaining accurate procedures, it did not describe the high degree of confidence, and the bases for that confidence, residing in the existing set of procedures at the time the NRC issued generic letter 83-28, July 8, 1983. At that time, the WNP-2 staff was involved in a rigorous start-up program in preparation for: 1) Licensing (December, 1983), and 2) the Power Ascension Test Program, culminating in completion of the 100% warranty run, December 12, 1984. Prior to July 1983, and well into the Power Ascension Test Program (1984), the maintenance, operating, and test procedures were being developed. This development included NSSS review and acceptance of those procedures addressing the

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NSSS scope. To a large extent, the NSSS vendor also participated in the preparation of these procedures, concentrating on test procedures which were in turn, used to develop post-maintenance procedures. As the staff is well aware, this period of plant development consists of continuous system scrutiny, test result evaluation, operating characteristics analyses, and acceptance criteria measurement. During this period, the plant staff worked in concert with the NSSS vendor to ensure that a safe operating plant, complete with procedures, was delivered. The successful attainment of this goal, and the cooperation of the NSSS vendor during this period, forms the basis for the confidence the Supply System has in the existing WNP-2 procedures.

Subsequent to completion of the Power Ascension Test Program and declaration of commercial operation, the Supply System created a process to ensure that the existing procedures continued to reflect the latest knowledge in component and system operation. On a two-year basis, each procedure used to verify system operability, post-maintenance, is reviewed to ensure that vendor, engineering, and industry practice recommendations are reviewed for incorporation in the procedure. Records of the review assignment, completion, and resultant changes are available on site and are maintained per plant procedure, governing the maintenance, retention, and disposition of WNP-2 Plant documents. This two-year requirement is complimented by the vendor information receipt, review, and incorporation process discussed in the reference letter. The combination of routine procedure reviews and control of vendor information ensures that any appropriate guidance is included in the test and maintenance procedures or the technical specifications, as required.

Should you have any further questions regarding this matter, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

GC Sorensen

G. C. Sorensen, Manager
Regulatory Programs

PLP:kjt

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