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 SORENSON, G. C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Forwards addl clarification of conformance to Reg Guide
 1.97, Rev 2 re reactor water level, drywell drain sumps &
 RHR HX outlet temp, per request.

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Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Ms. E. G. Adensam, Project Director
BWR Project Directorate No. 3
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

Subject: NUCLEAR PLANT NO. 2
EMERGENCY RESPONSE CAPABILITY - CONFORMANCE
TO R. G. 1.97, REVISION 2, CLARIFICATION

Reference: Letter, G02-85-710, G. C. Sorensen (SS) to W. R.
Butler (NRC), same subject, dated October 8, 1985

The reference provided clarification of WNP-2 conformance to Regulatory Guide 1.97, Revision 2 as requested by the Staff. In a subsequent conversation between Messrs. J. O. Bradfute and J. Joyce of your staff and Messrs. P. L. Powell, G. W. Brastad and R. E. Green of the Supply System, additional clarification with regard to reactor water level, drywell drain sumps and residual heat removal heat exchanger outlet temperature was requested. Accordingly, the attached additional clarification is provided.

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

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh
Attachments

cc: RC Barr - BPA
JO Bradfute - NRC
J Joyce - NRC
JB Martin - NRC RV
E Revell - BPA
NS Reynolds - BLCP&R
AD Toth - NRC Site

EB (LIAW)
PSB (L. HULMAN)
EICSB (SRINIVASAN)
RSB (ACTING)
FOB (VASSALLO)
AD - G. LAINAS (Ltr only)

ADD1

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ATTACHMENT

3.3.2 COOLANT LEVEL IN REACTOR

The WNP-2 FSAR, pages 7.5-1 and 7.5-1a, as amended in November 1984 describes the redundant differential pressure transmitters used to monitor from -310 to +60 inches. However, in addition, WNP-2 has two other reactor vessel water level monitoring systems; 1) from 0 to +180 inches, which is recorded in the Control Room, and 2) from 0 to +400 inches, which is indicated in the Control Room. Both of these monitors are single channel systems, powered from a Class 1E source. Therefore, the combination of reactor vessel level monitoring systems monitor from just below the bottom of the dryer skirt to the top of the reactor vessel head, a span from -310 inches to +400 inches, which exceeds the recommended range of the Regulatory Guide.

3.3.3 DRYWELL DRAIN SUMPS LEVEL

As discussed in the FSAR (page 7.5-21), the drywell sump leakage information during normal operation provides the operator with the means of determining valve leakage, pipe breaks, etc. The drywell equipment and floor sumps are floor drain flange lines that drain to the reactor building sumps. The flow between the drywell sump drains and the reactor building sumps is monitored by flow instrumentation. The reactor building sumps are monitored by level instrumentation. However, during a LOCA, the drywell floor drain flange lines leading to the reactor building sumps are isolated and all drywell leakage or flooding will flow into the suppression pool obviating the need to monitor sump level.

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 supplied from Class 1E power. Both the inlet and outlet temperature of the RHR heat exchangers are monitored, recorded and annunciated in the Control Room and are secondary to RHR system flow monitoring as defense-in-depth instrumentation (see 7.5.1.12). In addition, the RHR heat exchanger's operation is monitored by valve lineups, RHR and service water flow indications (Category 2 instrumentation), which is also indicated in the Control Room. Therefore, the Supply System believes the system need not be upgraded to Category 2 and is adequately monitored by diverse methods to determine system operation.

