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SORENSEN, G. C. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Discusses status of License Condition 2.C.(12) re alternate remote shutdown sys. Tech Specs for sys inappropriate based on maint of sys reliability through scheduled maint program & similar industry & staff appraisals.

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March 25, 1986
G02-86-259

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attn: 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
LICENSE CONDITION 2.C.(12), ALTERNATE
REMOTE SHUTDOWN SYSTEM, STATUS

The subject License Condition states that, "Prior to Startup following the first refueling outage, the licensee shall install, test, and have operable the alternate remote shutdown system". Accordingly, during the spring 1986 outage, the Supply System will be implementing changes to satisfy this license condition. Although not identified in the license condition, the Supply System has reviewed the system with regard to the need for implementing technical specifications. Based on the following, the Supply System has determined that addition of technical specifications as a requirement for the system is not necessary:

- In implementing, testing and proving the system operable, periodic testing and calibration procedures will be developed for inclusion in the plant Scheduled Maintenance System program. This will provide confidence that the system will remain operable.

- In addition, the increasing difficulty of maintaining technical specifications, recognized by both industry and regulatory personnel, has provided an incentive to ensure only appropriate technical specifications are created. To that end, the industry (represented by the Atomic Industrial Forum (AIF)) and the Staff's Technical Specification Improvement Program (TSIP) have worked to develop a technical specification screening criteria. The Supply System has reviewed the Alternate Remote Shutdown System design function against the following criteria:

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- An installed system that is used to detect, by monitors in the control room, a significant abnormal degradation of the reactor coolant pressure boundary; or

- A process variable that is an initial condition of the design basis accident; or

- A structure, system, or component that is part of the primary success path of a safety sequence analysis and functions or actuates to mitigate a design basis accident,

and concluded that the system design bases do not support the need for technical specifications. This same conclusion has been recognized independently by both the AIF Subcommittee on Technical Specification Improvements and the Staff's TSIP committee.

In summary, the Supply System considers that technical specifications for the Alternate Remote Shutdown System are not appropriate and bases this position on 1) a satisfactory level of system reliability to be maintained through the WNP-2 Scheduled Maintenance Program and 2) a recognition of similar industry and staff appraisals of the system with respect to technical specifications.

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

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh

cc: JO Bradfute - NRC
JB Martin - NRC RV
E Revell - BPA
NS Reynolds - BLCP&R
NRC Site Inspector