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SUBJECT: Responds to Generic Ltr 86-10 interpretation of high/low pressure interface concerns.

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June 3, 1987
G02-87-0190

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
RESPONSE TO GENERIC LETTER 86-10 INTERPRETATION
OF HIGH/LOW PRESSURE INTERFACE CONCERNS

- Reference:
- 1) Letter, G.W. Knighton (NRC) to G.C. Sorensen (SS), "Compliance with Requirements of Appendix R to 10 CFR Part 50 Relating to Prevention of LOCAs at High/Low Pressure Interfaces", dated May 13, 1987
 - 2) Letter, G02-86-1049, G.C. Sorensen (SS) to E.G. Adensam (NRC), "WNP-2 Fire Protection, Request for Additional Information", dated December 1, 1986

The purpose of this correspondence is to provide the information requested in Reference 1). This reference requested the Supply System to advise the Staff of modifications proposed to ensure isolation of either the RHR-V-8 or RHR-V-9 valve and provide a schedule for completion of the modifications.

As discussed during our telephone conference call of June 2, several letters have been sent to the Staff that presented various technical positions as well as safety considerations supporting the conclusion that a plant modification is unnecessary. The Supply System has attempted to reconcile the issue based on mechanistic failure considerations. The Staff appears to have adopted a non-mechanistic failure mode that will only recognize a configuration not affected by a selectively destructive, instantaneous fireball in the Control Room. The Supply System is interested in resolving this issue in a safe, expeditious and cost effective manner. Options identified to date include the following:

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RESPONSE TO GENERIC LETTER 86-10 INTERPRETATION OF
HIGH/LOW PRESSURE INTERFACE CONCERNS

- 1) De-energize RHR-V-8 or 9.
- 2) Provide separate transfer switch at a remote shutdown panel for the RHR-V-8 or 9.
- 3) Design a redundant interlock to maintain RHR-V-8 or 9 closed that is outside the control room.
- 4) Relocate one of the interlock relays outside the control room.
- 5) Relocate the RHR-V-8 or 9 power supply to outside the Reactor Building.

Each option varies in complexity, cost, installation limitations while operating, and regulatory complication. The safety analysis has not been performed for any of the options, but each is considered to have a high potential for becoming an unreviewed safety question per 10 CFR 50.59. Most of the options are considered implementable only during plant shutdown. As discussed during our June 2 conference call, the Supply System will evaluate the options and provide the NRC with our preferred option by mid August 1987. Subsequent design, procurement, installation and testing is expected to be completed prior to startup from the spring 1988 refueling outage. In the interim, it is our understanding, based on the June 2 discussion that the Staff concurs that plant startup and operation is acceptable based on the compensatory measures which have been taken.

With respect to the discrepancy in FSAR Amendment 37, the decision to de-energize RHR-V-8 and 9 was initially made to satisfy the NRC position and without knowledge of the conflict with the Emergency Procedure Guidelines and NUREG-0737, item II.B.2. The Supply System subsequently reversed its position as communicated to the Staff in telephone conversation and documented in our letter of December 1, 1986 (Reference 2). Unfortunately, we did not formally document the need to revise the FSAR, but it was discussed in a telephone conversation shortly after submittal. This subject was clearly not resolved as evidenced by the numerous conversations and correspondence subsequent to the submittal of Amendment 37. Failure to revise the FSAR should be regarded as a simple oversight and the FSAR will be revised in a subsequent update to reflect the final resolution.

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RESPONSE TO GENERIC LETTER 86-10 INTERPRETATION OF HIGH/LOW PRESSURE
INTERFACE CONCERNS

We share the NRC's desire to resolve this issue as soon as possible. As discussed on June 2, we view the Staff's request to modify the system to be a potential backfit as defined by 10 CFR 50.109. Simultaneous with the actions described above, we will pursue this issue with the Staff.

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

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

MRW/bk

cc: GW Knighton - NRC
JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA, 399
NRC Site Inspector - 901A



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