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ACCESSION NBR: 8708260125 DOC. DATE: 87/08/20 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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SUBJECT: Responds to Generic Ltr 86-10. Util determined that providing transfer switch on remote shutdown panel for RHR-V-8 valve preferred method for ensuring isolation of either RHR-V-8 or V-9 in event of control room fire.

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August 20, 1987
G02-87-232

Docket No. 50-397

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

Gentlemen:

Subject NUCLEAR PLANT NO. 2
 RESOLUTION OF GENERIC LETTER 86-10
 HIGH/LOW INTERFACE CONCERN

Reference: Letter, G02-87-0190, GC Sorensen (SS) to NRC,
 "Response to Generic Letter 86-10 Interpretation
 of High/Low Pressure Interface Concerns", dated
 June 3, 1987

The reference committed to provide the preferred method for ensuring the isolation of either RHR V-8 or V-9 in the event of a control room fire. The Supply System has determined that providing a transfer switch on the remote shutdown panel for the RHR-V-8 valve is the preferred method. However, as discussed in the reference, there are several conditions that must be considered prior to implementing.

As related by members of the NRC staff the installed switch must be in the transferred position, removing control of RHR V-8 from the control room during normal operations. In that position the RHR permissive interlock (reactor pressure high) will be bypassed, permitting the valve to be opened from the remote shutdown panel. The Supply System has determined that this proposed change represents an unreviewed safety question requiring NRC staff approval prior to implementation. With control removed from the control room, and the permissive interlock inoperable during power operation the bases upon which WNP-2 was licensed has changed to the extent resolution is required. In addition, this proposed change requires an amendment to the WNP-2 Technical Specifications to implement. Technical Specification Table 3.3.2-1, Isolation Actuation Instrumentation item 5.b. Reactor Vessel Pressure - High (RHR cut-in permissive) will require a change to recognize that the instrumentation is inoperable during specific operating conditions.

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RESOLUTION OF GENERIC LETTER 86-10 HIGH/LOW INTERFACE CONCERN

In recognition of the significance of this change and the need for a thorough review, the Supply System proposes to implement this change at the next refueling outage. The intervening period will be utilized to identify any needed technical specification changes and evaluate the unreviewed safety question so that NRC concurrence can be obtained to support the implementation schedule. As discussed in a phone conversation August 6, 1987, between Messrs. G. Knighton, R. Samworth and J. Ridgely of the NRC staff and P.L. Powell and H.L. Aeschliman of the Supply System, Mr. Samworth will review similar changes recently completed on other plants and provide WNP-2 examples of technical specification changes previously approved that recognize the proposed change. This will ease the process of submittal, review and approval of any technical specification changes.

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

Very truly yours,



for G. C. Sorensen, Manager
Regulatory Programs

PLP/bk

cc: JB Martin - NRC RV
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