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ACCESSION NBR: 8810240175 DOC. DATE: 88/10/07 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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RECIP. NAME RECIPIENT AFFILIATION
 MARTIN, J.B. Washington Public Power Supply System
 Region 5, Ofc of the Director

SUBJECT: Provides updated schedule of commitments re completion of
 fire protection issues, per Insp Rept 50-397/88-16.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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October 7, 1988
G02-88-214

Docket No. 397

Mr J. B. Martin
Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Dear Mr. Martin:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21
SCHEDULE FOR COMPLETION OF FIRE PROTECTION
ISSUES (INSPECTION REPORT 88-16)

Reference: 1) Letter, G02-88-156, CM Powers (SS) to
JB Martin (NRC), same subject, dated July 15, 1988
2) NRC Inspection Report No. 50-397/88-16, dated July 25, 1988
3) Letter, G02-88-168, GC Sorensen (SS) to NRC
"Inspection Report 87-19, item 29 Instrument Rack
Terminations", dated July 29, 1988

In Reference 1) the Supply System provided a schedule for completion of the remaining open items identified during the Fire Protection Audit held June 6-10, 1988. Shortly thereafter NRC Inspection Report No. 50-397/88-16 (IR 88-16) was issued which contains additional clarification of the NRC's understanding of the Supply System's commitments. In the cover letter to IR 88-16, the NRC also made comments regarding the Supply System's failure to achieve adequate corrective actions with regard to fire barrier protection of certain safe shutdown trains, as well as the appropriateness of the Supply System's position regarding high/low pressure interface valves. The purpose of this letter is to provide an updated schedule of the commitments made in Reference 1), as well as to address the other concerns expressed in IR 88-16, even though no response is required.

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SCHEDULE UPDATE

1. Issue 87-19-07/08 DG Flooding & Common Mode Failure
(Open Item 3.M in IR 88-16)

Installation of the scuppers on the south doors leading outside the D/G building and raising the curbs to seven inches for the north doors leading into the D/G corridor will be completed by August 1, 1988 (complete).

The modifications necessary to provide diversion of the water outside the D/G building will be implemented by July 1, 1989 (on schedule).

Interim action to divert the water outside of the D/G building will be taken by August 15, 1988 (complete).

For the purpose of calculating the flooding potential of the HPCS Diesel Generator Room (Calculation No. 05.51.55), the Supply System will assume that all 28 sprinkler heads installed in the HPCS Diesel Generator Room could be actuated by fire.

2. Issue 87-19-29 Instrument Rack Terminations
(Open Item 3.N in IR 88-16).

A revised NOV response will be submitted by July 29, 1988 (complete, see G02-88-168, dated July 29, 1988)

In the future, terminations which are greater than 45 degrees will be replaced when determined during surveillance or modifications. The appropriate procedure has been deviated to reflect this commitment (complete - PPM 10.25.19).

The procedure which is used as the guidance for new terminations or repairs will be revised by March 15, 1989 (on schedule).

The Supply System has performed an in depth evaluation and determined that an additional inspection does not need to be performed to verify the integrity of the terminations (see Reference 3).

3. NRR Question 4 of 28 Sensing Line Supports
(Open Item 2.D.4 in IR 88-16)

The calculation verification will be completed by July 15, 1988 (complete, see G02-88-155, dated July 15, 1988).

The installation of the thermolag and the bolt change-out will be completed by December 1, 1989 (on schedule).

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SCHEDULE FOR COMPLETION OF FIRE PROTECTION
ISSUES (INSPECTION REPORT 88-16)

4. NRR Question 5 of 28 Bio-Shield Wall Penetrations
(Open Item 2.E.5 in IR 88-16)

We will revise the Fire Protection Controls procedure and Fire Watch Training program by September 1, 1988. The change will identify the concern regarding ignition of the foam and provide guidance aimed at prevention of a fire in this area (complete - PPM 1.3.35).

We will submit a revised response to question 5 of our January 11, 1988 letter by October 28, 1988 to address the NRC concerns identified during the subject audit.

5. NRR Question 15 of 28 (50.59 Review of Fire Protection Modifications)
(Not Addressed in IR 88-16)

The changes to the Fire Protection Program made in association with Amendment 38 to the FSAR have been reviewed and determined to be in compliance with the intent of the interim agreement, dated January 29, 1987 between NRR and the Supply System, as it relates to License Condition 2.C.(14), pending staff approval of Amendment 37.

The changes contemplated in Amendment 39, as well as others determined to be necessary prior to approval of Amendment 37 and subsequent removal of the license condition, will be the subject of future discussions between NRR and the Supply System staff. We expect these discussions to be initiated by July 22, 1988 (complete, per Supply System/NRC telecon on July 22, 1988 and follow-up letter G02-88-183, dated August 23, 1988).

6. Issue 86-25-03 Fire Main Under the D/G Building
(Open Item 3.C.(2) in IR 88-16)

We have supplied the documentation that NRR has requested and are awaiting their response. We are prepared to discuss and resolve this issue at the staff's earliest possible convenience.

The Supply System has recently completed additional analyses using nationally recognized methods. These analyses are currently under discussion with the Staff.



7. Issue 86-25-08 and NRR Question 25 of 28 (RHR-V-9 Thermolag and High Impedance Fault Analysis)

A. Item 4.A.(1) in IR 88-16 (Violation 88-16-01)

Installation of the RHR-V-9 thermolag will be complete by August 12, 1988 (complete).

Section F.4 of the FSAR will be revised to describe protection for high/low pressure interface valves. The methodology to be described in the FSAR would apply to all high/low pressure interface valves. The Supply System has evaluated all other similar valves to assure that this methodology was appropriately applied. The valves evaluated are listed on F.4-11. Except for RHR-V-8/V-9, all others already meet the Generic Letter 86-10 guidelines.

We will plan to resubmit the answer to Question 25 by September 30, 1988 to address the NRC concerns identified during the subject audit. (Complete -- See G02-88-209, dated September 30, 1988).

B. Item 4.A.(2) in IR 88-16 (Violation 88-16-02)

The results of the Appendix R calculation regarding high impedance faults during a fire related shutdown has resulted in a requirement to shed loads from the Division 2, 125 VDC battery.

The loads which need to be shed have been identified by Engineering and evaluated by the Operations Department. The procedure has been deviated, and the manual actions verified (PPM 4.12.1.1).

The executive summary requested by the Inspection team will be submitted by July 15, 1988 (complete, see G02-88-157, dated July 15, 1988)

8. LER 87-29 (88-08) Fire Seals
(Open Item 3.P in IR 88-16)

The walkdown of Tech. Spec. fire seals, as committed to in LER 88-08, has been completed. A reconciliation between the prints and PSTS (Penetration Seal Tracking System) and the PSTS users manual will be in place by August 31, 1988. (The reconciliation was completed on schedule and signed off September 1, 1988. A control procedure (EI2.24) has been approved and issued in place of a "user's manual.")

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SCHEDULE FOR COMPLETION OF FIRE PROTECTION
ISSUES (INSPECTION REPORT 88-16)

In the inspection report (IR 88-16), at the top of page 24, a statement is made regarding retraining of plant personnel involved in the inspection of the seals. It should be clarified that the training that the Supply System had referred to in this regard was that committed to in LER 87-029. In there, the Supply System said that training will be provided on fire-rated penetration requirements to Plant Technical Engineers, Plant Maintenance Engineers, Plant QC Inspectors, Plant Craft and Contractor Field Engineers.

The PMR review discussed in the same paragraph has been completed and the appropriate actions taken.

9. LER 87-30 Missing 3 hour Fire Wall
(Open Item 3.Q in IR 88-16)

Thermolag will be applied to the wall to provide a 3 hour fire rating. The structural steel will then be provided with a 3 hour fire rating. The work will be completed by December 22, 1988 (on schedule).

10. IE Notice 86-106, Supplement 2
(Open Item 3.T in IR 88-16)

All issues are resolved with the exception of the affect of fire suppression water on security systems. The evaluation of this issue will be complete by January 2, 1989 (on schedule).

11. Issue 86-05-06 20 Foot Combustible Free Zone
(Items 3.L & 5 in IR 88-16: Violation 88-16-04)

The 20 foot combustible free zone has been walked down and all trays which encroach the zone have been identified and included in the scope of an MWR to perform the necessary work. The thermolag work associated with the identified deficiencies will be completed by September 14, 1988 (Complete).

The above zone, originally intended to be temporarily marked, has been permanently marked instead.

In addition to the thermolag work, the covered trays inside the 20 foot zone will be labeled and the zone will be posted in a manner to identify it as a combustible free zone. This work will be completed by September 30, 1988 (Complete).

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SCHEDULE FOR COMPLETION OF FIRE PROTECTION
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12. Regulatory Guide 1.75 - Electrical Separation in the Remote Shutdown Panel
(Open Item 4.B in IR 88-16: Item 88-16-03)

Modification has been completed (see NCR 88-228 and PMR 88-186).

CONCERNS REGARDING CORRECTIVE ACTION ADEQUACY

The Supply System shares your concerns in this matter. With respect to previously identified discrepancies, the following clarifications are offered by way of explanation.

- o In mid-1986 the inspection of the Cable Spread Room 20 foot Exclusion Zone and one hour protection for safe shutdown cables was performed to an earlier inspection criteria. The design data used for these inspections also contained an error. Since the NRC inspection of June 1988, the Cable Spread Room has been totally reinspected to the criteria developed for one hour areas and the 20' combustible free zone.
- o With respect to the protection of power cables for the high/low pressure interface valve RHR-V-9, the Supply System does not and did not believe that this was a credible event, but nevertheless agreed to add additional thermolag in the interest of resolving the issue.
- o With respect to the few isolated instances of missing thermolag, the Supply System has heightened the awareness of the appropriate personnel through informal individual/group discussions, as well as re-emphasizing the procedural aspects.
- o As an additional step, the 20 foot exclusion zone as well as individual trays have been permanently marked. Nearly everything within the zone that is not concrete or steel is being covered with thermolag, except a few building fixtures and assemblies for which acceptable substitutes are not available (i.e., emergency lights, exit signs, portable fire extinguisher hose, tygon tubing for the Fire Protection System drain, etc.).

HIGH/LOW PRESSURE INTERFACE CONCERNS

The Supply System believes that the NRC's comments regarding the appropriateness of the Supply System's actions with respect to RHR-V-8/V-9 leaves the wrong impression, and we will take this opportunity to provide some clarification in this matter.

The Supply System has never believed that this issue involved an NRC "requirement" per se, but rather a staff interpretation of "guidance" on high/low pressure interface valves contained in generic letter 86-10. As is customary and an accepted practice, the Supply System was attempting to negotiate a realistic approach to what we consider to be a non-credible event. As indicated by the attached chronology and the following discussion, the Supply System has made every reasonable effort to resolve this issue in a timely manner. (Chronology previously submitted with G02-88-002 dated 1/5/88). This submittal updates that Chronology.

The subject of power removal from high/low pressure interface valves was first brought up by the Staff in early 1986. The Supply System agreed to remove power from RHR-V-123A/B, but advised the Staff that we did not agree that removal of power from either RHR-V-8 or V-9 was either necessary or safe. We believe such power removal to be contrary to the health and safety of the public, and was addressed in great detail in numerous letters and telephone conversations with the Staff.

The NRC, in June 1986, recommended an acceptable alternative to removing power (refer to Item 12 in the Attachment), i.e., revise appropriate annunciator response procedures to utilize remote shutdown transfer switches to prevent simultaneous opening of valves RHR-V-8 and V-9 during a control room fire. The Supply System was led to believe that this would resolve the issue to the NRC's satisfaction. However, in October 1986 the NRC reopened the issue with no reference to the June agreements (refer to Item 15 in the Attachment). In December 1986 the Supply System reconfirmed the unacceptability of power removal. During an NRC exit interview in April, 1987 NRR assumed responsibility from Region V for resolution of the issue.

The NRC, in the May 13, 1987 letter to the Supply System, requested a schedule for completion of "appropriate modifications" to the RHR valves. At this point the Supply System had to date been unable to obtain an evaluation of the technical positions presented to the NRC. Plant Management directed the Technical Staff to evaluate modification options for review and approval. The Supply System committed to provide a "preferred option" to the NRC by mid-August (Refer to Docket Letter G02-87-232). The NRC responded on October 2, 1987 suggesting that they may not approve these modifications, but requested that the Supply System submit the proposal along with an appropriate unreviewed safety question determination and Technical Specification revisions. The Supply System submitted the proposal in Docket Letter G02-88-002 (Item 24 in the Attachment).

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SCHEDULE FOR COMPLETION OF FIRE PROTECTION
ISSUES (INSPECTION REPORT 88-16)

Following a meeting with the NRC on January 19, 1988 where the NRC provided an additional requirement for a keylocked switch, the Supply System submitted an amended proposal which included the switch (Item 26). The NRC subsequently approved this design and the associated Technical Specification change.

Based on the above summary, the Supply System believes that our actions were timely, appropriate and represent a significant effort on our part.

ADDITIONAL CLARIFICATIONS

Under Item 2.BB in IR 88-16, the Staff indicated that "The licensee plans to incorporate manual WMC-064 and the NFPA code deviations in the April 13, 1987 letter, into Amendment No. 39 to the FSAR". We will clarify that this will be done by reference when the fire protection section is rewritten subsequent to approval of Amendment No. 37.

The Supply System is extremely pleased with the progress that was made as a result of the subject fire protection audit. Nearly all of the outstanding items are either closed or soon will be, and we view this progress as a significant improvement in the Supply System's overall efforts.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

HLA/bk
Attachment

cc: Document Control Desk - NRC
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

RHR-V-8 & V-9 CHRONOLOGY OF EVENTS

1. JUNE, 1983 - AMENDMENT NO. 31 TO WNP-2 FSAR

In Q-040.079 the NRC required compliance with BTP RSB 5-1 to preclude a LOCA thru the Hi/Low Pressure Interface. It states in part:

"These two motor operated valves and their associated cable may be subject to a single fire hazard."

In the Supply System's response, the acceptability of RHR-V-8 and V-9 was specifically addressed.

This amendment was reviewed and accepted by the NRC with no conditions attached to our license, nor were there any additional questions and/or concerns identified in the SER or its supplements.

2. MAY 10, 1984 - LICENSEE EVENT REPORT 84-031

Notification of physical wiring problems and thermolagging/fire barriers associated with Safe Shutdown (SSD) path. No concerns were raised regarding Hi/Low Pressure Interface valves. Identified a cable that provides an isolation signal to RHR-V-123A that was not protected.

3. June 7, 1985, Letter to GC Sorensen from DF Kirsch (NRC Region V), "Nonconformance of Safe Shutdown Equipment to Appendix R Requirements." Referred to LER 84-031 and requested further information regarding deficiencies found with respect to SSD in the event of a Control Room Fire. Requested response within 10 days, did not specifically address any valves.

4. June 17, 1985, Letter to DF Kirsch from GC Sorensen. Response to NRC Region V request (item 3 above), included description of seven deficiencies as well as proposed resolution (Attachment A).

Deficiency (No. 7 in letter)

In the Control Room, the physical separation between the control switches for two series high-to-low pressure system interface valves (RHR-V-53A and RHR-V-123A) is not sufficient to preclude hot shorts from opening both valves simultaneously and failing the low pressure safe shutdown system during a Control Room fire.



Proposed Resolution:

One of the two series valve control circuits will be routed to a transfer switch located in the Remote Shutdown Room allowing isolation. Operation of this transfer switch will be specified in the Main Control Room evacuation procedure.

5. March 14, 1986, Letter to GC Sorensen from DF Kirsch (NRC Region V).

NRC prepared and issued an SER relative to the nonconformance issue identified in references 3 and 4 above.

"As indicated in the enclosed SER, the NRR staff has found the Supply System's proposed resolutions to be acceptable with the proviso that the transfer switch to be located outside the control room (see Deficiency 7, Reference 2) normally should be set in the "isolate" position. We suggest that you obtain verification that the Supply System accepts and will implement this proviso."

"Item seven deals with the potential opening of the high/low RHR pressure interface due to a control room fire generating an open signal to both valves RHR-V-53A and RHR-V-123A which are in series. As an interim measure, the licensee must remove power from one of these valves, such as by opening the breaker to the valve. Although this is an acceptable means to resolve the high/low pressure interface problem the licensee has proposed installing a transfer switch outside of the control room in order to isolate one valve from the control room in the event of a fire in the control room. This is acceptable provided that the transfer switch is maintained normally in the "isolate from the control room" position. Pending acceptance of this interim measure, the interim measures and corrective actions are acceptable."

6. April 4, 1986 NRC Region V Inspection Report No. 86-05

Item 4.4.2 (page 8) of this report indicated that the Licensee had determined that three sets of RHR system valves need analysis and protection. The NRR (Region V) stated that RHR-V-53A and 123A should be de-energized.

"Several potential candidates were identified and discussed with the licensee. The licensee was able to resolve all concerns with the additional valves (emphasis added)."

7. April 24, 1986 - Generic Letter 86-10 issued. This GL was surrounded by controversy and confusion as evidenced by the workshops that were held around the country prior to its issuance.

The Staff's present position with regard to RHR-V-8 and V-9 appears to be based solely on an interpretation of this generic letter.

8. May 23, 1986, Letter to GC Sorensen from EG Adensam, "WNP-2 Fire Protection - Request for Additional Information"

NRR requires further signal/spurious automatic function loss evaluation.

9. June 11, 1986 meeting with NRC in Bethesda to discuss NRC's request for additional information. First indication that there may be valves, other than those noted in the April 4, 1986 inspection report, of concern to NRR.

10. June 30, 1986, Letter, G02-86-613, GC Sorensen to EG Adensam, "WNP-2 Fire Protection Program - Request for Additional Information".

Response to 12 questions from NRC (nothing related directly to RHR-V-8/V-9).

Supply System reiterates single failure analysis approach (Question 5).

11. June 1986

During this month the Supply System had numerous telephone conversations with John Ridgley in which we specifically discuss RHR-V-8 and V-9 and our technical and licensing bases for not being required to remove power. Mr. Ridgley suggested that changing the annunciator response procedure would resolve the issue. Procedures were revised.

12. July 16, 1986, Letter, G02-86-656, GC Sorensen to EG Adensam, "Final Resolution of Hi/Low Pressure Interface Concern"

This is in response to NRC's SER dated March 14, 1986. This appears to be first formal indication that multiple spurious actuations must be considered with respect to Hi/Low Pressure Interface Valves.

13. August 1986 - NRC Region V Inspection 86-25 dated December 29, 1986. RHR valve position noted as an open item, deferred to NRR for resolution.

14. Due to direct interaction with representatives from NRR and Region V at the August 1986 inspection exit meeting a letter committing to remove power, as suggested by the NRR representative, was drafted. Simultaneously, a hurried change was made to the FSAR (Amendment 37), which contained an error in referring to power removal as the preferred approach. During the review of the draft response, safety ramifications not previously recognized were identified that required us to reconsider removing power from RHR-V-8.

A decision was made to continue to interact with the staff to reconcile or obtain satisfactory justification for modifying the RHR-V-8 design.

15. October 20, 1986, Letter EG Adensam to GC Sorensen "Request for Additional Information"

In item 7, Hi/Low Pressure Interface in RHR System the NRC requested:

- a) Document your commitment to remove power from the RHR-V-8 valve during non-shutdown operating conditions.
- b) Document your commitment to remove the power from the RHR-V-123A and RHR-V-123B valves either at the valve or at the MCC.
- c) Provide a schedule and justification for the schedule to implement items a) and b) above.

16. December 1, 1986, Letter, G02-86-1049, GC Sorensen to EG Adensam "WNP-2 Fire Protection, Request for Additional Information",

- o Removed power from RHR-V-123A & V-123B
- o Reconfirmed position contained in our response of July 16, 1986 (i.e. do not intend to remove power). Provided additional technical and regulation based justification.

17. April 7, 1987 - NRC Region V Inspection Report 87-02 (participants included Adensam, Ridgley, Campe, Hulman, et al).

Item 2.G - Hi/Low Pressure Interface Analysis specifically addressed RHR-V-8 and V-9.

Per EG Adensam, NRR assumed responsibility to resolve regulatory conflicts and provide specific direction addressing those conflicts.



18. May 13, 1987, Letter G Knighton to GC Sorensen, "Compliance with Requirements of Appendix R to 10CFR50 Regarding Prevention of LOCAS at Hi/Low Pressure Interfaces."

"We (NRC) are advising you that we require WPPSS to implement appropriate modifications to these isolation valves (RHR-V-8 and V-9) as soon as practical...."

Further asked us to advise of planned modifications to ensure isolation as well as schedule for completion.

19. June 3, 1987, Letter, G02-87-190, GC Sorensen to NRC, "Response to Generic Letter 86-10 Interpretation of Hi/Low Pressure Interface Concerns."

Supply System committed to provide preferred option by mid-August

20. August 20, 1987, Letter, G02-87-232, GC Sorensen to NRC, "Resolution of Generic Letter 86-10 Hi/Low Interface Concern"

Identified providing a transfer switch on the remote shutdown panel for the RHR-V-8 valve as the preferred method. Also identified bypassing the RHR permissive interlock as an unreviewed safety question, and pointed out the need for a T/S change to Table 3.3.2-1.

21. October 2, 1987, Letter, GW Knighton to GS Sorensen, "WNP-2 Proposed Resolution of Spurious Opening of RHR-V-8 and RHR-V-9 in the Event of a Control Room Fire."

Acknowledged our preferred action to provide a transfer switch on the remote shutdown panel and to have control of RHR-V-8 transferred to the remote panel during normal operation.

22. October 9, 1987, Information Notice No. 87-50 "Potential LOCA at High-and-Low-Pressure Interfaces from Fire Damage."

The Supply System was totally surprised by the Information Notice issuance and is preparing a response to address the inaccuracies contained therein.

23. December 23, 1987, Letter GW Knighton to GC Sorensen, "NRC Review and Approval of RHR-V-8/RHR-V-9 Resolution (TAC # 63528)."

Encouraged early submittal of our proposal so as not to impact restart after refueling.



24. January 5, 1988, Letter, G02-88-002, GC Sorensen to NRC, "Request for Technical Specification Amendment, Table 3.3.2-1 Isolation Actuation Instrumentation"

Submitted Tech. Spec. change to accommodate transfer of control of RHR-V-8 to the Alternate Remote Shutdown Panel during normal operation. Resultant bypassing of the interlocks determined to be unreviewed safety question.

25. January 19, 1988, meeting with NRC in Bethesda. Purpose of meeting was to discuss certain NRC staff concerns regarding inadvertent opening of RHR-V-8 when transferred with the interlocks bypassed.

26. February 12, 1988, Letter, G02-88-037, GC Sorensen to NRC, "Request for Technical Specification Amendment, Table 3.3.2-1, Isolation Actuation Instrumentation (Additional Controls)."

1. Supply System agrees to operate with the transfer switch placed in the "emergency" position.
2. The bypassing of the automatic isolation signals is discussed.
3. The installation of a key lock switch to prevent inadvertent operation of the valve is agreed to.

27. March 15, 1988, Letter, G02-88-059, GC Sorensen to NRC, "Request for Technical Specification Amendment Table 3.3.2-1, Isolation Actuation Instrumentation (Additional Clarification)."

Made editorial changes to previous submittal.

28. May 26, 1988, NRC issues Amendment No. 58 to WNP-2 Technical Specifications thereby approving request for amendment.

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