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SUBJECT: Requests withdrawal of 980805 proposed TS amend,modifying SR 3.8.4.7 to allow performance discharge test of SR 3.8.4.8 to be performed in lieu of battery svc test.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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September 8, 1998
GO2-98-162

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21, WITHDRAWAL OF TECHNICAL SPECIFICATION AMENDMENT REQUEST TO TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 3.8.4.7**

Reference: Letter GO2-98-142, PR Bemis (SS) to NRC, "Technical Specification Amendment Request to Technical Specification Surveillance Requirement 3.8.4.7," dated August 5, 1998.

The Supply System hereby requests withdrawal of the referenced Technical Specification amendment request for Technical Specification Surveillance Requirement (SR) 3.8.4.7. In the referenced letter, the Supply System requested modification of Technical Specification SR 3.8.4.7 to allow the performance discharge test of SR 3.8.4.8 to be performed in lieu of the battery service test for the division 1 and 3, 125 VDC, batteries E-B1-1 and HPCS-B1-DG3, and the division 1, 250 VDC battery E-B2-1. At the time of the amendment submittal, the Supply System had determined that the service test required by SR 3.8.4.7 would expire for battery E-B1-1 on October 19, 1998, followed by E-B2-1 on November 3, 1998, and HPCS-B1-DG3 on November 5, 1998. It was requested the amendment remain in effect until SR 3.8.4.7 was performed in the R-14 refueling outage, or during a forced outage of sufficient duration.

On August 8, 1998 WNP-2 entered Mode 4 as a result of a Technical Specification required shutdown. The duration of the ensuing forced outage allowed sufficient time to perform the battery service test required by SR 3.8.4.7 on all of the subject batteries and return them to a fully charged status prior to plant startup.

A001/0

Since compliance to SR 3.8.4.7 will no longer expire during the current operating cycle, the necessity for the referenced Technical Specification amendment no longer exists.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. PJ Inserra at (509) 377-4147.

Respectfully,

D. W. Coleman

DW Coleman
Manager, Regulatory Affairs
Mail Drop PE20

cc: EW Merschoff - NRC-RIV
DF Kirsch - NRC-RIV, WCFO
C Poslusny, Jr. - NRC-NRR
NRC Sr. Resident Inspector - 927N
DL Williams - 1399
PD Robinson - Winston & Strawn

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50-397

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 15, 2000

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: NRC STAFF EVALUATION OF INSERVICE INSPECTION PROGRAM (ISI) RELIEF REQUEST 2ISI-18 AND 2ISI-19, WNP-2 (TAC NO. MA6333)

Dear Mr. Parrish:

By letter dated August 12, 1999, Energy Northwest requested relief from the requirements of subsections IWE and IWL of Section XI of the American Society of Mechanical Engineers Code (ASME) for the First Containment Inspection Interval. Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of Class CC (concrete containment) and Class MC (metallic containment) of light-water cooled power plants.

Relief request 2ISI-18 requested relief from meeting the provisions of Subarticle IWA-2300 of the 1992 Edition and Addenda of ASME Section XI that examination personnel be qualified and certified in accordance with ANSI/ASNT CP-189, "Standard for Qualification and Certification of Nondestructive Testing Personnel." In lieu of using the requirements of Section IWA-2300, the licensee proposes to conduct examinations with personnel qualified and certified to a written practice based on SNT-TC-1A and the 1989 Edition of ASME Section XI.

Relief request 2ISI-19 requested relief from meeting the provisions of ASME Section XI, 1992 Edition, 1992 Addenda, IWE-2420. In lieu of using the requirements of IWE-2420, ASME Section XI, 1992 Edition, the requirements of IWE-2420, ASME Section XI, 1998 Edition will be used.

The NRC staff has evaluated the information provided by Energy Northwest. For Relief Request 2ISI-18, the staff concludes that compliance with the code requirements would result in a hardship without a compensating increase in the level of quality and safety, and that the licensee's proposed alternative will provide reasonable assurance of containment pressure integrity. Therefore, the proposed alternative is authorized for the first ten-year containment inspection interval pursuant to 10 CFR 50.55a(a)(3)(ii). For Relief Request 2ISI-19, the

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licensee's proposed alternative will provide an acceptable level of quality and safety. Therefore, the proposed alternative is authorized for the first ten-year containment inspection interval pursuant to 10 CFR 50.55a(a)(3)(i). Our related safety evaluation is enclosed.

Sincerely,

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Safety Evaluation

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELIEF REQUESTS FROM ASME SECTION XI REQUIREMENTS

FOR CONTAINMENT INSPECTION

ENERGY NORTHWEST

WNP-2

DOCKET NO. 50-397

1.0 INTRODUCTION

In the *Federal Register* dated August 8, 1996 (61 FR 41303), the Nuclear Regulatory Commission (NRC) amended its regulations to incorporate by reference the 1992 edition with 1992 addenda of Subsections IWE and IWL of Section XI of the ASME Boiler and Pressure Vessel Code (Code). Subsections IWE and IWL provide the requirements for inservice inspection (ISI) of Class CC (concrete containment) and Class MC (metallic containment) of light-water cooled power plants. The effective date for the amended rule was September 9, 1996, and it requires the licensees to incorporate the new requirements into their ISI plans and to complete the first containment inspection by September 9, 2001. However, a licensee may propose alternatives to or submit a request for relief from the requirements of the regulation pursuant to 10 CFR 50.55a(a)(3) and (g)(5).

By letter dated August 12, 1999, Energy Northwest proposed an alternative to the requirements of Subsections IWE and IWL of Section XI of the ASME Code for WNP-2. The following are the NRC staff's findings.

2.0 EVALUATION

2.1 Relief Request 2ISI-18

Code Requirements:

ASME Section XI, 1992 Edition, 1992 Addenda, Subarticle IWA-2300, requires examination personnel to be qualified and certified to the requirements of ANSI/ASNT CP-189.

Specific Relief Requested:

Relief is requested from meeting the provisions of Subarticle IWA-2300, "Qualifications of Nondestructive Examination Personnel." This Subarticle requires personnel that perform nondestructive examinations be qualified and certified using a written practice in accordance with ANSI/ASNT CP-189, "Standard for Qualification and Certification of Nondestructive Testing Personnel," as amended by the requirements of ASME Section XI.

Basis for Relief:

Relief is requested in accordance with 10 CFR 50.55a(a)(3)(i) in that the proposed alternative provides an acceptable level of quality and safety.

The requirements regarding examination of Code Class 1, 2, and 3 components (10 CFR 50.55a) reference the 1989 Edition of ASME Section XI. The qualification of nondestructive examination personnel is addressed in Subarticle IWA-2300 of the 1989 Edition and requires a written practice based on SNT-TC-1A, as amended by the requirements of Subarticle IWA-2300. The licensee has implemented a qualification program based on the above requirements.

In a *Federal Register* Notice dated August 8, 1996 (61 *Federal Register* 41303), the NRC amended 10 CFR 50.55a to incorporate by reference the 1992 Edition with 1992 Addenda of Subsections IWE and IWL of Section XI of the ASME Boiler and Pressure Vessel Code. This change represents an addition to the Inservice Inspection (ISI) Program Plan. The ASME Section XI, 1992 Edition, 1992 Addenda requires the use of a written practice based on the requirements of ANSI/ASNT CP-189, as amended by the requirements of Subarticle IWA-2300, to implement Subsection IWE. This is a duplication of the existing written practice and existing qualification and certification program for personnel that perform nondestructive examinations of Code Class 1, 2, and 3 components (as noted in the above paragraph).

Alternative Examinations:

Examinations required by Subsection IWE shall be conducted by personnel qualified and certified to a written practice based on the current ISI Section XI Code of record for Subsections IWB, IWC, IWD, and IWF for the remainder of the second ISI inspection interval. The current Code for the second inspection interval is the 1989 Edition, no Addenda. These alternate requirements will be revised to the latest approved written practice when the ISI Program Plan for IWB, IWC, IWD, and IWF is revised for the third ISI inspection interval. The revision is anticipated to be completed in 2005.

In addition to the current written practice for personnel performing examinations of Code Class 1, 2, and 3 components, as described in the previous paragraph, the following will be included in the written practice for IWE personnel qualification:

1. A near distance test chart that meets the requirements of IWA-2321 and IWA-2322 ASME Section XI, 1992 Edition, 1992 Addenda will be used for annual demonstration of natural or corrected near distance visual acuity.

2. Personnel performing IWE examinations will receive instructions pertinent to IWE components.

Justification for Granting Relief:

The licensee will revise the written practice for qualifying and certifying examination personnel to ASME Section XI, IWA-2300, 1992 Edition, 1992 Addenda, or later, when the ISI program is revised for the third ISI inspection interval during 2005.

The alternative incorporates provisions of IWA-2321 and IWA-2322 of the 1992 Code for vision and illumination requirements as alternate visual near distance requirements for the remainder of the second ISI inspection interval.

The alternative provides qualification and certification to the same requirements used for personnel performing examinations of Code Class 1, 2, and 3 components in addition to specific requirements for visual acuity for IWE component examinations. The alternative meets, as a minimum, the requirements for examinations now being performed on Code Class 1, 2, and 3 components, therefore, providing an adequate level of quality and safety.

Visual examination is the primary nondestructive examination method required by Subsection IWE. Neither CP-189 or SNT-TC-1A specifically includes visual examination, thus, the Code requires qualification and certification to comparable levels as defined in CP-189 or SNT-TC-1A, as applicable, and the employees written practice.

The latest Edition of ASME Section XI (1998) no longer requires nondestructive examination examiners to be qualified or certified using CP-189 for performance of visual containment examinations (IWE-2330). The 1998 Edition of Section XI requires that the Owner establish a qualification and certification program.

The current requirements represent a hardship to WNP-2, and its vendors, regarding the development and maintenance of an additional, separate written practice. Development and administration of a second program would not enhance safety or quality and would serve as a burden, particularly in developing a second written practice, tracking of certifications, and duplication of paperwork. This duplication would also apply to nondestructive examination vendor programs. Updating to the 1992 Edition, 1992 Addenda, for subsections IWB, IWC, IWD, and IWF would require a request for relief similar to this one. The alternate, as a minimum, has the same requirements for performing visual examination of Code Class 1, 2, and 3 components.

Staff Evaluation:

In lieu of using the requirements of Section IWA-2300 of the 1992 Edition and Addenda of ASME Section XI that examination personnel be qualified and certified in accordance with ANSI/ASNT CP-189, "Standard for Qualification and Certification of Nondestructive Testing Personnel," the licensee proposes to conduct examinations with personnel qualified and certified to a written practice based on SNT-TC-1A and the 1989 Edition of ASME Section XI. This relief is requested for the first ten-year containment inspection interval for WNP-2.

The staff recognizes that under the current licensee inspection program, examinations are to be conducted by personnel qualified and certified to a written practice based on SNT-TC-1A in accordance with the 1989 Edition of ASME Section XI. The staff also realizes that a written practice based on the requirements of CP-189, as amended by the requirements of Section IWA-2300, to implement Sections IWE and IWL duplicates efforts already in place for all other subsections. To develop and to administer a second program would constitute a burden, particularly in developing a second written practice, tracking of certifications, and duplication of paperwork. In addition, Section IWA-2300 of the 1992 Edition, 1992 Addenda, states that certification based on SNT-TC-1A are valid until recertification is required. Furthermore, in this

request, the licensee indicated that these alternate requirements will be revised to the latest approved written practice when the ISI Program Plan for IWB, IWC, IWD, and IWF is revised for the third ISI inspection interval. The revision is anticipated to be completed in 2005.

On the basis discussed above, the staff concludes that developing and implementing two qualification programs for NDE personnel would result in a burden on the licensee. The alternative proposed by the licensee will provide adequate qualifications for personnel performing containment examinations. Therefore, the request for relief is authorized for the first ten-year containment inspection interval of the WNP-2 containment ISI program pursuant to 10 CFR 50.55a(a)(3)(ii) on the basis that compliance with the specific requirements of the Code would result in hardship without a compensating increase in the level of quality and safety.

2.2 Relief Request 2ISI-19

Code Requirements:

ASME Section XI, 1992 Edition, 1992 Addenda, IWE-2420(b) and IWE-2420(c) state:

"(b) When component examination results require evaluation of flaws, areas of degradation, or repairs in accordance with IWE-3000, and the component is found to be acceptable for continued service, the areas containing such flaws, degradation, or repairs shall be reexamined during the next inspection period listed in the schedule of the inspection program of IWE-2411 or IWE-2412, in accordance with Table IWE-2500-1, Examination Category E-C.

(c) When the reexaminations required by IWE-2420(b) reveal that the flaws, areas of degradation, or repairs remain essentially unchanged for three consecutive inspection periods, the areas containing such flaws, degradation, or repairs no longer require augmented examination in accordance with Table IWE-2500-1, Examination Category E-C."

Specific Relief Requested:

Relief is requested from implementing ASME Section XI, 1992 Edition, 1992 Addenda, IWE-2420.

Basis for Relief:

Relief from the above requirements is requested under 10 CFR 50.55a(a)(3)(i) in that the proposed alternative provides an acceptable level of quality and safety.

Alternative Examination:

The requirements of IWE-2420, ASME Section XI, 1998 Edition will be used.

Justification for Granting Relief:

In its justification for granting relief, the licensee stated that the current requirement is ambiguous, contradicts IWE-3122, and does not follow similar requirements for ASME Section XI, Code Class 1, 2, and 3 components.

When a component is subjected to an inservice examination, ASME Section XI provides four means for acceptance in IWE-3122. These four means are:

1. IWE-3122.1 - results do not exceed acceptance standards of IWE-3400,

2. IWE-3122.2 - results exceed the acceptance standards, but the component is repaired,

3. IWE-3122.3 - results exceed the acceptance standards, but the component is replaced, and

4. IWE-3122.4 - results exceed the acceptance standards, but the component is evaluated as acceptable for continued service.

In accordance with IWE-3122, only when an unacceptable examination result is evaluated and determined acceptable for continued service is a reexamination required during the next inspection period. Contrary to this, the requirements of IWE-2420 would require reexamination during the next inspection period for components that were repaired. Performing successive examinations on a component that has been repaired is not warranted since the component has been restored to an acceptable condition.

The proposed alternate requirement removes the ambiguity and conflict between IWE-3122 and IWE-2420.

ASME has approved the proposed alternative.

Staff Evaluation:

In lieu of meeting the 1992 edition of ASME Section XI requirements of performing successive examinations for components which are restored, via repair activities, to an acceptable condition for continued service in accordance with standards of IWE-3000, the licensee proposed to use the requirements specified in IWE-2420, ASME Section XI, 1998 Edition. In the 1998 Edition of Subsections IWE-2420(b) and IWE-2420(c) of ASME Section XI, repairs were removed from the reexamination requirements. Also, in the 1998 Edition of Subsection IWE-2420(c) of ASME Section XI, the schedule of reexamination was changed from "three consecutive inspection periods" to "the next successive inspection period."

The staff realizes that when repairs are complete, IWA-4150 requires licensees to evaluate the suitability of the repair. When a repair is required because of the failure of an item, the evaluation shall consider the cause of failure. Also, the repaired item receives, as required, preservice examinations to ensure that the repair is suitable. If the repair is not suitable, the repair does not meet code requirements and the component is not acceptable for continued

service. Also, Subsections IWB-2420(b), IWC-2420(b), and IWD-2420(b) of ASME Section XI do not require the successive inspection of repairs for Class 1, 2, and 3 components as required in IWE-2420(b) for metal containment. In addition, changing the schedule of reexamination of areas that remain essentially unchanged from "three consecutive inspection periods" to "the next inspection period" is consistent with the requirements for Class 2 components.

On the basis discussed above, the staff concludes that the licensee's proposed alternative (the use of 1998 Edition of ASME Section XI, Subsection IWE-2420) will provide an acceptable level of quality and safety and, therefore, is authorized pursuant to 10 CFR 50.55a(a)(3)(i).

3.0 CONCLUSION

Based on our review of the information provided in the requests for relief (Relief Requests 2ISI-18 and 2ISI-19), the staff concludes that, for Relief Request 2ISI-19, the licensee's proposed alternative will provide an acceptable level of quality and safety. Therefore, the proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(i). For Relief Request 2ISI-18, the staff concludes that compliance with the code requirements would result in a burden without a compensating increase in the level of quality and safety, and that licensee's proposed alternative will provide reasonable assurance of containment pressure integrity. Therefore, this proposed alternative is authorized pursuant to 10 CFR 50.55a(a)(3)(ii).

Principal Contributor: T. Cheng, NRR/EMEB

Date: March 15, 2000

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

March 7, 2000

Mr. Ian C. Rickard
Director, Nuclear Licensing
ABB Combustion Engineering Nuclear Power, Inc.
P.O. Box 500
2000 Day Hill Road
Windsor, CT 06095-0500

SUBJECT: WNP-2 - REQUEST FOR WITHHOLDING INFORMATION FROM PUBLIC DISCLOSURE (TAC NO. MA7228)

Dear Mr. Rickard:

By letter dated February 7, 2000, Energy Northwest submitted additional information on an amendment request regarding Technical Specification 4.3.1.2.b in response to a written request from the Nuclear Regulatory Commission (NRC) staff. Energy Northwest requested that the information be withheld from public disclosure pursuant to 10 CFR 2.790.

An affidavit dated January 25, 2000, from ABB, the owner of the information was included in the application. ABB states that the submitted information should be considered exempt from mandatory public disclosure for the following reasons:

"a. A similar product is manufactured and sold by major competitors of ABB.

b. Development of this information by ABB required thousands of dollars and hundreds of manhours of effort. A competitor would have to undergo similar expense in generating equivalent information.

c. The information consists of technical data and qualification information for ABB-supplied products, the possession of which provides a competitive economic advantage. The availability of such information to competitors would enable them to design their product to better compete with ABB, take marketing or other actions to improve their product's position or impair the position of ABB's product, and avoid developing similar technical analysis in support of their processes, methods or apparatus.

d. In pricing ABB's products and services, significant research, development, engineering, analytical, manufacturing, licensing, quality assurance and other costs and expenses must be included. The ability of ABB's competitors to utilize such information without similar expenditure of resources may enable them to sell at prices reflecting significantly lower costs."

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We have reviewed your submittal and the material in accordance with the requirements of 10 CFR 2,790 and, on the basis of ABB's statements, have determined that the submitted information sought to be withheld contains trade secrets or proprietary commercial information and should be withheld from public disclosure.

Therefore, "WNP-2 SVEA-96 Fuel Assemblies Dry Fuel Storage Criticality Safety Evaluation," marked as proprietary, will be withheld from public disclosure pursuant to 10 CFR 2.790(b)(5) and Section 103(b) of the Atomic Energy Act of 1954, as amended.

Withholding from public inspection shall not effect the right, if any, of persons properly and directly concerned to inspect the complete documents. If the need arises, we may send copies of this information to our consultants working in this area. We will, of course, ensure that the consultants have signed the appropriate agreements for handling proprietary information.

If the basis for withholding this information from public inspection should change in the future such that the information could then be made available for public inspection, you should promptly notify the NRC. You should also understand that the NRC may have cause to review this determination in the future, for example, if the scope of a Freedom of Information Act request includes your information. In all review situations, if the NRC needs additional information from you or makes a determination adverse to the above, you will be notified in advance of any public disclosure.

If you have any questions regarding this matter, I may be reached at (301) 415-1424.

Sincerely,

/RA/
Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

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WNP-2, RAI, Request To Revise License Condition 2.C.(16) Of Facility Operating Licens
e No. NPF-21.

Body:
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Docket: 05000397

AA3

Temp=NRR-088
Accession No=ML00368-3255

February 15, 2000

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR WNP-2 (TAC NO. MA6165)

Dear Mr. Parrish:

By letter dated July 29, 1999, Energy Northwest submitted for NRC staff review, an amendment request to revise License Condition 2.C.(16) of Facility Operating License No. NPF-21. As a result of the review, the NRC staff has determined that additional information is needed to complete the review. The information needed is detailed in the enclosure.

The enclosed request was discussed with Mr. Inserra of your staff on February 1, 2000. A mutually agreeable target date of March 15, 2000, was established for responding to the RAI. If circumstances result in the need to revise the target date, please call me at your earliest opportunity at (301) 415-1424.

Sincerely,
/RA/
Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Request for Additional Information

cc w/encl: See next page

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cc:

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Mr. Bob Nichols
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, Washington 98504-3113

REQUEST FOR ADDITIONAL INFORMATION

POST ACCIDENT NEUTRON FLUX MONITORING LICENSE CONDITION 2.C(16)

WNP-2

DOCKET NO. 50-397

1. In Section 2.2, Accuracy: NEDO Section 5.2.2, of your July 29, 1999, submittal, you state that due to inaccuracies in the detectors, amplifiers and recorders, the APRMs would slightly exceed the accuracy requirement of ± 2 percent of rated thermal power. Please provide additional clarification of the APRM accuracy and justification if the criterion cannot be met.

2. In Section 2.8, Power Sources: NEDO Section 5.2.8, you stated that the APRMs will lose power on a loss of offsite power until power is restored by division 1 and 2 diesel generators and the motor generator breakers are manually reset. The NEDO criterion is for an uninterruptable and reliable power source. Please provide additional justification for not meeting this criterion.

Enclosure

1/3/2000

Distribution Sheet

Priority: Normal

From: Stefanie Fountain

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Subject:
REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR WNP-2

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Mr. J.V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

January 3, 2000

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR WNP-2, (TAC NO. MA7228)

Dear Mr. Parrish:

By letter dated November 18, 1999, Energy Northwest submitted for staff review an amendment request to revise Subsection 4.3.1.2.b of Technical Specification 4.3.1, "Criticality," to reflect the increased fuel spacing requirements in the new fuel storage vault at WNP-2. As a result of the review, the staff has determined that additional information is needed to complete the review. The information needed is detailed in the enclosure.

The enclosed request was discussed with Mr. Inserra of your staff on December 20, 1999. A mutually agreeable target date of January 30, 2000, was established for responding to the RAI. If circumstances result in the need to revise the target date, please call me at your earliest opportunity at (301) 415-1424.

Sincerely,
/s/
Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Request for Additional Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 3, 2000

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR WNP-2, (TAC NO. MA7228)

Dear Mr. Parrish:

By letter dated November 18, 1999, Energy Northwest submitted for staff review an amendment request to revise Subsection 4.3.1.2.b of Technical Specification 4.3.1, "Criticality," to reflect the increased fuel spacing requirements in the new fuel storage vault at WNP-2. As a result of the review, the staff has determined that additional information is needed to complete the review. The information needed is detailed in the enclosure.

The enclosed request was discussed with Mr. Inserra of your staff on December 20, 1999. A mutually agreeable target date of January 30, 2000, was established for responding to the RAI. If circumstances result in the need to revise the target date, please call me at your earliest opportunity at (301) 415-1424.

Sincerely,

J Cushing

Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Request for Additional Information

cc w/encl: See next page

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Manager, Regulatory Affairs Manager
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Office of the Governor
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Olympia, Washington 98504-3113

REQUEST FOR ADDITIONAL INFORMATION

FUEL STORAGE

WNP-2

DOCKET NO. 50-397

1. Discuss briefly the types of analyses (including any seismic dynamic analysis) performed to determine the structural integrity of the various elements affected by the new geometrical limitations for storage of new fuel assemblies in the new fuel racks. This discussion should include the analyses related to the accidental drop of fuel assemblies on the vault floor and on the racks, including the accidental drop of the fuel assemblies being supported by the pedestal.

2. Provide a summary of the results of the above analyses and confirm that the (strength) "capacities" of the various structural elements (e.g., the pedestal, vault floor, rack walls, cover plates, etc.) are adequate to satisfy the demands imposed on them by the new configuration of the fuel assemblies as per the applicable industry codes.

3. Provide report CE NPSD-787-P, "WNP-2 SVEA-96, Fuel Assemblies Dry Fuel Storage Criticality Safety Evaluation."

Enclosure

1/3/2000

Distribution Sheet

Priority: Normal

From: Stefanie Fountain

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Subject:
WNP-2, RAI, RHR Shutdown Cooling - Hot Shutdown

Body:
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Docket: 05000397

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Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

January 3, 2000

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR WNP-2 (TAC NO. MA6166)

Dear Mr. Parrish:

By letter dated July 29, 1999, Energy Northwest submitted for staff review an amendment request to revise Technical Specification 3.4.9, "Residual Heat Removal Shutdown Cooling - Hot Shutdown." As a result of the review, the staff has determined that additional information is needed to complete the review. The information needed is detailed in the enclosure.

The enclosed request was discussed with Mr. Arbuckle of your staff on November 17, 1999. A mutually agreeable target date of January 15, 2000, was established for responding to the RAI. If circumstances result in the need to revise the target date, please call me at your earliest opportunity at (301) 415-1424.

Sincerely,

/RA/

Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Request for Additional Information

cc w/encl: See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 3, 2000

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION (RAI) FOR WNP-2 (TAC NO. MA6166)

Dear Mr. Parrish:

By letter dated July 29, 1999, Energy Northwest submitted for staff review an amendment request to revise Technical Specification 3.4.9, Residual Heat Removal Shutdown Cooling - Hot Shutdown. As a result of the review, the staff has determined that additional information is needed to complete the review. The information needed is detailed in the enclosure.

The enclosed request was discussed with Mr. Arbuckle of your staff on November 17, 1999. A mutually agreeable target date of January 15, 2000, was established for responding to the RAI. If circumstances result in the need to revise the target date, please call me at your earliest opportunity at (301) 415-1424.

Sincerely,

J Cushing

Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Request for Additional Information

cc w/encl: See next page

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Mr. Albert E. Mouncer (Mail Drop 1396)
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Mr. Paul Inserra (Mail Drop PE20)
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Vice President, Operations Support/PIO
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1400 L Street, N.W.
Washington, DC 20005-3502

Mr. Bob Nichols
Executive Policy Division
Office of the Governor
P.O. Box 43113
Olympia, Washington 98504-3113

REQUEST FOR ADDITIONAL INFORMATION

RESIDUAL HEAT REMOVAL SHUTDOWN COOLING - HOT SHUTDOWN

WNP-2

DOCKET NO. 50-397

In its July 29, 1999 submittal, the licensee stated that the basis for the requested technical specification (TS) change is that the original plant design operating temperature for the residual heat removal (RHR) shutdown cooling (SDC) piping and supports is less than the operational limit currently required by TS Limiting Condition for Operation (LCO) 3.4.9. During a conference call with the staff on November 17, 1999, the licensee stated that in 1988, an evaluation was performed to assess the condition of the RHR SDC piping system because of the potential of exposing the piping system to beyond original design operating temperature. The licensee is requested to provide the details of that 1988 assessment (with respect to thermal stress limit and thermal fatigue cycle limit) and its findings.

11/8/99

Distribution Sheet

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Subject:
WNP-2 - REVISIONS TO THE UPDATED FINAL SAFETY ANALYSIS REPORT (UFSAR) - P AST AND FUTURE COMPLIANCE WITH 10 CFR 50.71 (e)(4) (TAC NO. M72496)

Body:
PDR ADOCK 05000397 P

Docket: 05000397, Notes: N/A

AA3

Docket File

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

November 8, 1999

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: WNP-2 - REVISIONS TO THE UPDATED FINAL SAFETY ANALYSIS REPORT (UFSAR) - PAST AND FUTURE COMPLIANCE WITH 10 CFR 50.71(e)(4) (TAC NO. M72496)

Dear Mr. Parrish:

Title 10 of the *Code of Federal Regulations* (10 CFR), Subsection 50.71(e)(4) specifies the schedular requirements whereby licensees are to submit revisions to their Updated Final Safety Analysis Reports (UFSARs). It requires revisions to be made "....annually or 6 months after each refueling outage provided the interval between successive updates does not exceed 24 months." In a 1997 survey, we found numerous incidents of noncompliance by licensees of both single- and multi-unit plants with this schedular requirement. In many cases, licensees for multi-unit sites were basing their UFSAR submissions on the outage schedule of one unit.

We understand that some confusion about the proper interpretation of 10 CFR 50.71(e)(4) may have been caused by an NRC staff letter to Commonwealth Edison Company (ComEd) dated June 15, 1993, which endorsed a submission schedule proposed by ComEd for its plants. Neither ComEd's proposed schedule nor the staff's endorsement were in literal compliance with 10 CFR 50.71(e)(4). Nevertheless, many licensees adopted the staff position expressed in the June 15, 1993, letter and thus deviated from the schedular requirements of this regulation. Recently, the staff granted exemptions to the ComEd plants. The transmittal letter (D. Skay to O. D. Kingsley, dated July 27, 1999) states that "this [Skay] letter and the enclosed exemptions supersede our letter of June 15, 1993."

We note that you have not requested a schedular exemption to 10 CFR 50.71(e)(4) for WNP-2. This may indicate that either you intend to comply with the correct interpretation of the regulation, or you may have incorrectly interpreted the regulation in the past. The purpose of this letter is to clarify any misunderstanding of this regulation. We will exercise enforcement discretion, in accordance with Section VII.B.6 of the NRC Enforcement Policy, for any incidents of past violation of 10 CFR 50.71(e)(4). In the future we will enforce the schedular requirements as prescribed, or as modified by an exemption for WNP-2.

9911190124

9932400324

DF01

There is no need to respond to this letter. If you have any questions, please call me at 301-415-1424.

Sincerely,

Original Signed By:

Jack Cushing, Project Manager, Section 2
Project Directorate & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

cc: See next page

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There is no need to respond to this letter. If you have any questions, please call me at 301-415-1424.

Sincerely,

Jack Cushing, Project Manager, Section 2
Project Directorate IV and Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

cc: See next page

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Chief Counsel
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Vice President, Operations Support/PIO
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