

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Informs that util implemented severe accident mgt program with issuance of revised EOPs & severe accident guidelines (SAGs) on 980715, per commitment in 950328 ltr. WNP-2 EOP/SAG differences to BWROG EPG/SAG noted in encl App A.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

September 30, 1998
GO2-98-172

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2 OPERATING LICENSE NPF-21
WNP-2 IMPLEMENTATION OF SEVERE ACCIDENT MANAGEMENT

Reference: Letter GO2-95-059, dated March 28, 1995, JV Parrish (SS) to NRC,
"Implementation of the Formal Industry Position on Severe Accident
Management"

In the referenced letter, the Supply System committed to implementation of Severe Accident Management by December 31, 1998. WNP-2 has implemented its Severe Accident Management Program with the issuance of revised Emergency Operating Procedures (EOPs) and Severe Accident Guidelines (SAGs) on July 15, 1998. The WNP-2 EOP/SAGs were developed from the generic BWR Owners' Group "Emergency Procedure and Severe Accident Guidelines, Revision 1," dated July 1997. Differences between the WNP-2 plant specific implementation and the generic guidelines are delineated in Appendix A. As noted in Appendix A, two new deviations have been identified and several deviations have been withdrawn since implementing the previous BWROG EPG, Revision 4. The other previously identified deviations remain. //

Implementation of Severe Accident Management utilized the implementation guidance of Nuclear Energy Institute's NEI 91-04, Revision 1, "Severe Accident Issue Closure Guidelines." Implementation has included training of the operating personnel on the revised EOP/SAGs, training of ERO personnel on the Technical Support Guidelines developed as tools and calculational aids for support personnel, and conducting mini-drills for the six operating crews and four ERO teams. ADOJ

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WNP-2 IMPLEMENTATION OF SEVERE ACCIDENT MANAGEMENT

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Should you have any questions or desire additional information regarding this matter, please contact me or Mr. DW Coleman at (509) 377-4342.

Respectfully,



JV Parrish
Chief Executive Officer
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Attachment

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APPENDIX A

WNP-2 EOP/SAG DIFFERENCES TO THE BWROG EPG/SAG

REFERENCES:

- A.1 Letter, GO2-94-292, dated December 30, 1994, JV Parrish (SS) to NRC, "NRC Inspection of WNP-2 Emergency Operating Procedures (NRC Inspection Report Nos. 91-27 and 94-01)"
- A.2 Letter, GO2-91-214, dated November 21, 1991, GC Sorensen (SS) to NRC, "NRC Inspection of WNP-2 Emergency Operating Procedures (NRC Inspection Report No. 91-27)"

The following table lists the deviations previously identified by the Supply System (References A.1 and A.2) for the WNP-2 EOPs as compared to the BWROG EPG, Revision 4. The deviations that are not applicable to the current plant specific WNP-2 Emergency Operating Procedures/Severe Accident Guidelines (EOP/SAGs) have been shaded in the table. A brief explanation is provided.

Two new deviations from the BWROG EPG/SAG, Revision 1, are identified at the end of the table and include a brief description.

APPENDIX A

WNP-2 EOP/SAG DIFFERENCES TO THE BWROG EPG/SAG

Deviation Number from GO2-91-214 (Ref. A.2)	Brief Description of Deviation per GO2-94-292 (Ref. A.1)	Disposition of Deviation*
<u>Design Deviations</u>		
DD-1/ID-2/ID-4 (per GO2-94-292)	ID #2, #4. Use average drywell temperature near instrument run	Retain as is.
DD-1 (per GO2-94-292)	Delete the use of pump NPSH limits	Retain as is.
DD-2	Deviation Withdrawn	
DD-3	Added caution on use of drywell sprays	Retain as is.
DD-4	Deviation Withdrawn	
DD-5/SD-1 (Refer to Strategy Deviation No. 1)	Allow RCIC to take suction from suppression pool.	Not a deviation per EPG/SAG changes.
DD-6	Delete defeating of isolation interlocks for drywell cooling	Retain as is.
DD-7	Deviation Withdrawn	
DD-8	Delete purge for hydrogen control.	Use of purge incorporated after design basis use of recombiners.
DD-9	Deviation Withdrawn	
DD-10, 11, 12	Deviation Withdrawn	
DD-13	Do not override interlocks to start reactor building HVAC.	Retain as is.
DD-14	Deviation Withdrawn	
DD-15	Use HPCS and LPCS for spray cooling 2/3 core height.	Retain as is.
DD-16	Use of HPCS during ATWS as an outside the shroud system.	Retain as is.
DD-17	Use GOTHIC code instead of Appendix C to generate curve.	Not a deviation per EPG/SAG changes.

* Based on SAM Implementation or other plant changes

APPENDIX A

WNP-2 EOP/SAG DIFFERENCES TO THE BWROG EPG/SAG

Deviation Number from GO2-91-214 (Ref. A.2)	Brief Description of Deviation per GO2-94-292 (Ref. A.1)	Disposition of Deviation*
<u>Strategy Deviations</u>		
SD-1/DD-5	Allow RCIC to take suction from suppression pool.	Not a deviation per EPG/SAG changes.
SD-2	Deviation Withdrawn	
SD-3	Use nitrogen when flammable oxygen/hydrogen present, do not use air	Retain as is.
SD-4	Added system required to vent primary containment to list of excluded systems.	Not a deviation per EPG/SAG changes.
SD-5	Same instructions for turbine building HVAC as for reactor building HVAC.	Not a deviation per EPG/SAG changes.
SD-6	Deviation Withdrawn	
SD-7	Deviation Withdrawn	
SD-8	Deviation Withdrawn	
SD-9	Deviation Withdrawn	
<u>Implementation Deviations</u>		
ID-2	Use reactor building abnormal procedure for temperature determination	Retain as is.
ID-4	Use average drywell temperature vs temperature near instrument run	Retain as is.
ID-5	Added bypass of steam tunnel interlocks	Not a deviation per EPG/SAG changes.
ID-9	Run RRC back to low frequency motor generator, then trip pump.	Not applicable now with the variable speed pumps.
ID-13	Use 51 ft cutoff for wetwell action levels instead of suppression pool spray elevation.	Retain as is.

* Based on SAM Implementation or other plant changes

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WNP-2 EOP/SAG DIFFERENCES TO THE BWROG EPG/SAG

Deviation Number from GO2-91-214 (Ref. A.2)	Brief Description of Deviation per GO2-94-292 (Ref. A.1)	Disposition of Deviation*
ID-14	Same as ID-13 except this one for vacuum breakers	Retain as is.
ID-15	Letdown from the suppression pool allowed only if no core damage.	Not a deviation per EPG/SAG changes.
ID-16	Do not include suppression pool monitoring system step.	Retain as is.
ID-18	Same as ID-13 except this one for wetwell vent line.	Retain as is.
ID-19	Restart of reactor building HVAC is not initiated even if radiation level setpoint clears	Not a deviation per EPG/SAG changes.
ID-23	Deviation Withdrawn	
ID-26	Use more than one water level measurement to cause exit.	Retain as is.
	Use LPCI through the shutdown cooling line.	Not a deviation per EPG/SAG changes.
ID-28	Deviation Withdrawn	
ID-29	Deviation Withdrawn	
ID-32	Use pressure at which valves open, not the pressure at which they open and close.	Not a deviation due to design change on containment exhaust purge valves, vent before primary containment pressure limit per EPG/SAG
ID-35	Bypass steam tunnel interlocks to prevent closure of MSIVs	Not a deviation per EPG/SAG changes.
ID-36	Added decision to determine if no core damage exists.	Retain as is.
NEW	NA	Use one curve for primary containment pressure Limit A, B, and C.
NEW	NA	Maintain use of hydrogen recombiners before vent/purge.

* Based on SAM Implementation or other plant changes