

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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SUBJECT: Confirms extension until 981218, for responding to apparent violation noted identified in NRC insp rept 50-397/98-20. Phase one implementation will allow to place running main fire pump in standby status.

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RESPONSE TO APPARENT VIOLATION EXTENSION REQUEST

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The Supply System recognizes the significance of the apparent violation. We have determined that the root cause is a design deficiency that requires correction to preclude recurrence. Accordingly, and as you are aware, we have taken short term interim actions or implemented compensatory measures to address the more significant design deficiencies until such time that a permanent design change can be implemented.

The interim actions and compensatory measures include:

- strengthening the reactor building standpipe isolation valves
- sustaining fire protection pressure with a continuously running main fire pump
- establishing an air cushion at the top of reactor building standpipes to mitigate pressure surges
- upgrading the trim design of the preaction and deluge valves to preclude sympathetic actuation on pressure transients
- enhancing operability testing for the motor driven pump modulating bypass valves to assure reliable performance
- performing a comprehensive system functional test to verify the effectiveness of these interim actions

The design modifications are projected to be in two phases. The design part of the phase one effort is nearing completion. Phase one completes the hydraulic analysis of the standpipe vacuum breaker design modification, installs the vacuum breakers, and installs a time delay in the diesel driven fire pump start logic to assure effective vacuum breaker response time. Phase one implementation will allow us to place the running main fire pump in standby status. Phase two is projected to replace the existing modulating bypass valves with standard relief valves and upgrade the motor driven fire pump controllers to a soft start design.

This extension allows the Supply System to provide a final design modification description, a schedule for implementation, and identify and evaluate any other NFPA 20 code deviations. This supplemental information will further assist the staff in its evaluation of the apparent violation during the enforcement deliberation effort.

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

Respectfully,



DW Coleman
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