

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

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SUBJECT: Advises that util evaluating NRC safety evaluation of RPT design & considering design mods to meet ATWS guidance.

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February 6, 1989  
G02-89-015

Docket No. 50-397

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
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Gentlemen:

Subject: NUCLEAR PLANT NO. 2  
OPERATING LICENSE NPF-21  
COMPLIANCE WITH ATWS RULE 10CFR50.62  
RELATING TO RPT SYSTEM

Reference: Letter to GC Sorensen (SS) from RB Samworth,  
"ATWS Rule 10CFR50.62 Relating to ARI and RPT  
Systems" (TAC No. 59158) dated December 6, 1988

In the reference letter the NRC Staff indicated that based on their review, the WNP-2 RPT design is not in full compliance with the ATWS Rule implementation guidance. The Staff went on to say that in order to achieve compliance with the guidance, the RPT initiation logic should be modified to a coincident logic and relay testing features should be incorporated or a demonstration should be made to show how the WNP-2 design satisfies the objective of the ATWS mitigation function. In the same letter, the Staff also indicated that these actions should be completed before restart following the next refueling outage.

The purpose of this letter is to advise you that the Supply System is presently evaluating the Staff's Safety Evaluation of our RPT design. We are considering a number of design modifications that the Staff will more readily accept as meeting the ATWS implementation guidance.

In order to ensure that any ultimate modifications result in a viable, problem-free long term solution, it is imperative that this effort proceed in a studied, methodical manner. In the Supply System's opinion, to attempt to conclude this effort before restart following the next refueling outage does not provide adequate time.

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COMPLIANCE WITH ATWS RULE 10CFR50.62  
RELATING TO RPT SYSTEM

The Supply System has considered the consequences of deferring this action to R-5 (spring of 1990). Because there have been no significant safety issues identified, the Staff's concerns as corresponded to date are limited to those identified in the reference letter. Regarding the concern expressed about coincident logic, the Supply System believes the interim actions committed to in response to NRC Bulletin 88-07 (including Supplement 1) ensure that the operator and plant response to a two pump trip caused by an inadvertent actuation will be adequate. We are presently evaluating design modifications to further address this staff concern.

Regarding the staff's second concern, namely relay testing features, WNP-2 was designed and licensed prior to the ATWS guidelines. With our present design, the breaker trip coil and tripping relay (K147 A/B) are the only components which we are not able to test at power without unacceptable consequences. We do, however, test these features on at least an annual basis and to date have found them to be extremely reliable. Therefore, in the interim, annual testing should be acceptable. We are also evaluating several design enhancements to facilitate this testing.

After we have fully evaluated all of the design considerations, we intend to discuss our preferred options with the Staff. We intend to initiate these discussions within the next 30 days.

The Supply System will exert our best efforts to satisfy the Staff's concerns on a timely basis. However, as a practical matter, and because there have been no safety concerns identified, it is neither appropriate, justified nor advisable for this action to be completed before restart following the next refueling outage.

Very truly yours,



G. G. Sorensen, Manager,  
Regulatory Programs

HLA/bk

cc: JB Martin - NRC RV  
NS Reynolds - BCP&R  
RB Samworth - NRC  
DL Williams - BPA/399  
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