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 RECIP.NAME RECIPIENT AFFILIATION

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SUBJECT: Provides supplemental info to 870210 request for amend to
 LC 2.C.(14) & removal of fire protection requirements.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

March 31, 1989
G02-89-050

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
REQUEST FOR AMENDMENT TO LICENSE CONDITION 2.C.(14)
AND REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM
TECHNICAL SPECIFICATIONS, SUPPLEMENTAL INFORMATION

Reference: 1) Letter, G02-87-046, GC Sorensen (SS) to NRC,
same subject, dated February 10, 1987
2) Generic Letter 88-12, "Removal of Fire Protection
Requirements from Technical Specifications",
dated August 2, 1988

Reference 1) responded to Generic Letter 86-10 to standardize the WNP-2 Fire Protection Licensing Condition and relocate fire protection technical specifications. Reference 2) provided additional guidance as to what portions of the fire protection technical specifications should and should not be removed from the Technical Specifications. The Supply System has compared these references and determined that the changes to the administrative sections requested in Reference 1) require modification. Reference 1) requested deletion of paragraphs 6.5.2.8.e, 6.5.2.8.h, and 6.8.1.g. As noted in Generic Letter 88-12 these paragraphs are to be retained in the Technical Specifications. Accordingly, the Supply System requests that the Staff not act on the request to remove these paragraphs.

Additionally Generic Letter 88-12 recommends that section 6.2.2.e (Fire Brigade Staffing Requirements) be relocated out of the Technical Specifications. The Supply System concurs with this recommendation and hereby requests the Staff to include this change in the changes proposed in Reference 1).

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REQUEST FOR AMENDMENT TO LICENSE CONDITION 2.C(14) AND REMOVAL OF
FIRE PROTECTION REQUIREMENTS FROM TECHNICAL SPECIFICATIONS

The Supply System has reviewed this additional request pursuant to 10 CFR 50.92 and considers it to be bounded by the significant hazards determination provided in Reference 1). The added changes do not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the changes proposed would not adversely impact the existing fire protection program. The program is being relocated, not significantly changed.
- 2) Create the possibility of a new or different kind of accident than previously evaluated because the changes proposed would not adversely affect the operation or function of any safety-related equipment.
- 3) Involve a significant reduction in a margin of safety because no change to the basis of the fire hazards analysis is being proposed.

As discussed above and in Reference 1), the Supply System considers that this change and those proposed in Reference 1) do not involve a significant hazards consideration, nor is there a potential for significant change in the types or significant increase in the amount of any effluents that may be released off-site, nor does it involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(9) and therefore, per 10CFR 51.22(b), an environmental assessment of the changes is not required.

These Technical Specification changes have been reviewed and approved by the WNP-2 Plant Operations Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB). In accordance with 10CFR 50.91, the State of Washington has been provided a copy of this letter.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

PLP/bk
Attachments


cc: C Eschels - EFSEC
JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Lic. Cond. 2. C (H)
FIRE PROT. T/S


I, G. C. Sorensen, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE 31 MAR., 1989


G. C. Sorensen, Manager
Regulatory Programs

On this day personally appeared before me G. C. Sorensen to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 31st day of March 1989.


Notary Public in and for the STATE
OF WASHINGTON

Residing at Richland, WA
My commission expires 7/14/91

