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 SORENSEN, G.C. Washington Public Power Supply System
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SUBJECT: Advises that after further evaluation, no Tech Spec change necessary or required re ODCM for listed reasons.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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May 24, 1989
G02-89-097

Docket No. 50-397

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

Subject: NUCLEAR PLANT O. 2
 OPERATING LICENSE NPF-21
 AMENDMENT NO. 6 TO THE OFFSITE DOSE CALCULATION MANUAL -
 SUPPLEMENTAL INFORMATION

Reference: 1) Letter, G02-89-040, GC Sorensen (SS) to NRC,
 same subject, dated March 15, 1989

 2) Letter, RB Samworth (NRC) to GC Sorensen (SS),
 "Acceptance of Offsite Dose Calculation Manual,
 Updated Through Amendment No. 4 (TAC No. 67331)",
 dated May 19, 1988

In Reference 2) the NRR provided a Technical Evaluation Report (TER), prepared by EG&G Idaho, Inc. of the WNP-2 Offsite Dose Calculation Manual (ODCM) through Amendment No. 4. In that report, EG&G identified what they considered to be a number of major and minor discrepancies. Among the minor discrepancies was item 17, having to do with the location of three of the 56 direct radiation stations identified in Table 3.12-1 of the WNP-2 Technical Specifications. This alleged discrepancy was characterized by EG&G as WNP-2 having no direct radiation stations in three of the sectors identified in the Tech. Specs.

Because the Staff had indicated in their letter to the Supply System (Reference 2) that there was no need for immediate attention, this item was not given a thorough evaluation at that time. Prior to evaluating all aspects of this minor discrepancy, in Reference 1) the Supply System indicated that a Tech. Spec. change would be submitted by May 15, 1989. This letter is to advise the Staff that after further evaluation, we do not feel that a Tech. Spec. change is necessary or required for the reasons identified below.

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AMENDMENT NO. 6 TO THE OFFSITE DOSE
CALCULATION MANUAL - SUPPLEMENTAL INFORMATION

1. Tech. Spec. Table 3.12-1, Radiation Environmental Monitoring Program, contains a footnote that states "The ... location of samples may vary from site to site."
2. Tech. Spec. Surveillance requirement 4.12.1 refers to the figure(s) in the ODCM for the specific locations.
3. Table 5-2 of the ODCM has the footnote "a": Estimated from center of WNP-2 containment from map positions.
4. Paragraph 5.1 of the ODCM specifies that the WNP-2 sampling stations are described in Table 5-2 (of the ODCM) and "...radial distance from WNP-2 containment as estimated from map positions".
5. The estimated distances (to the nearest tenth of a mile) included in Table 5-2 of the ODCM were compared to the ranges identified in Table 3.12-1 of the Tech. Specs. which were in whole kilometers.
6. Two of the three sample locations have estimated distances that are outside the 6 - 9 km range by 0.2 and 0.1 miles, while the third sample location's estimated distance is outside the 9 -12 km range by 0.2 miles.

The location(s) of the sample stations were listed in the ODCM on the basis of estimated distances taken from maps. The ODCM clearly contemplated that the accuracy of these locations was subject to the uncertainties necessarily attendant in establishing locations from maps using simple scaling techniques. Both the ODCM and the Tech. Specs. anticipated that these distances would not be exact, and made provision for this as discussed above.

A large data base has been established on the basis of the distances presently listed. Minor differences of a few tenths of a mile in their actual locations would have little or no impact in the offsite dose calculations that are required to be performed.

Generic Letter 89-01 dated January 31, 1989, contemplates removal of the Radiological Effluent Technical Specifications (RETS) from the existing WNP-2 Technical Specifications. The Supply System is evaluating this issue through its participation in the BWR Owners Group. It would be counter to the Commission's Interim Policy Statement on Technical Specification Improvement to make unnecessary changes to existing Technical Specifications.

Page Three
AMENDMENT NO. 6 TO THE OFFSITE DOSE
CALCULATION MANUAL - SUPPLEMENTAL INFORMATION

Because the Tech. Specs. provide for flexibility in the location of the stations (footnote of Table 3.12-1) and refer to the ODCM for the exact location (Section 4.12.1) we believe compliance to the Tech. Specs. is being achieved and as such no change is required.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

HLA/bk

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

DESCRIPTION OF CHANGE

REASON FOR CHANGE

7.0 REVISIONS TO THE ODCM

During this reporting period, Amendment No. 8 was made to the Offsite Dose Calculation Manual (ODCM).

7.1 This rationale is intended to provide a concise explanation of the changes made to the WNP-2 Offsite Dose Calculation Manual (ODCM) for Amendment Number 8.

DESCRIPTION OF CHANGE

REASON FOR CHANGE

- | | |
|--|---|
| 1) Page 40, X/Q in Tables 3-10 and 3-11 are updated to reflect 6 years of data. | To reflect the most current long-term meteorology that is available at this time. |
| 2) Page 61, Table 3-2, deleted vegetables from the 6.4 mile SE location. | The Radiological Environmental Monitoring Program does not obtain vegetables nor meat on a routine basis at this location. However, produce is collected at approximately 4.2 miles ESE and vegetable dose evaluations are made at 4.8 miles SE. Meat is evaluated at this location, as meat samples have been obtained in the past but not on a routine basis. It does provide for conservatism. |
| 3) Page 62, Table 3-3, updated dispersion and deposition values. | This change reflects the long-term meteorology data and is included to make Table 3-3 more current with up-to-date X/Q and D/Q values. |
| 4) Page 63 and 63a, Table 3-4 has the column heading changed to $\lambda(\text{sec}^{-1})$. | An error in the column heading was noted on this table for the lambda value. Instead of $\text{sec}(\lambda-1)$, it should read $\lambda(\text{sec}^{-1})$. |
| 5) Pages 73-80, Tables 3-10 and 3-11. These tables have been changed to reflect the long-term X/Q and D/Q values covering Jan. 1, 1984 - Jan. 1, 1990, which is the most current meteorology data. Pages 81-84 can be left blank as these pages were a repeat of those values in Table 3-11. | This change reflects the most up-to-date meteorology data covering six (6) years of post operational (Jan. 84 - Jan. 90). Values for the Turbine and Radwaste Buildings are the same, therefore, pages 81-84 are left blank and Table 3-12 was omitted as it was previously just a repeat of Table 3-11 and the present Table 3-11 carries the heading for both the Turbine and Radwaste Buildings. |

- 6) Tables 5-1 and 5-2 were updated to reflect changes/corrections to sampling locations and station designations. Some sample station distances from the plant were slightly different than the distances estimated for the locations using more accurate maps. New milk sampling locations were not on the existing tables. Station 35 was on Table 5-2 but should have been deleted since it was no longer serving as a source of samples.
- 7) Editorial changes were made on pages 95 and 96, due to the change in the name of the Washington State Department of Social and Health Services to the Washington State Department of Health.
- 8) Figures 5-1 and 5-2 were revised to reflect the current REMP sampling locations. These changes involved the addition of new milk sampling locations at Stations 62 and 63 and the correction of the Station 91 (apples) location. Also, the designation for Station 38A was changed to include the river above Ice Harbor Dam and the designation "38B" for the Lower Granite Dam was removed.

Tables 5-1 and 5-2 did not contain the most current information concerning REMP sampling locations. The tables were updated to reflect the current sampling program.

The name of this state regulatory agency changed in 1989, so the ODCM text was changed to reflect the current agency designation.

These maps were revised to reflect the current REMP sampling program.

7.2 These changes do not reduce the accuracy or reliability of dose calculations or setpoint determinations.

7.3 Amendment Number 8 to the ODCM was reviewed and approved during POC meeting 90-46 dated November 14, 1990.

7.4 This section consists of Attachment 1 which is a complete revised copy of the WNP-2 "Offsite Dose Calculation Manual" (ODCM). Attachment 1 is sent only to the Nuclear Regulatory Commission (NRC).