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SUBJECT: Responds to Generic Ltr 89-13, "Service Water Sys Problems Affecting Safety-Related Equipment."

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November 9, 1989  
G02-89-205

Docket No. 50-397

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

Gentlemen:

Subject:           NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21  
                  GENERIC LETTER 89-13, SERVICE WATER SYSTEM  
                  PROBLEMS AFFECTING SAFETY-RELATED EQUIPMENT

The reference (Generic Letter 89-13) included five recommended actions to be taken by addressees to ensure that their service water systems are, and will be, maintained in compliance with appropriate regulations. A reply within 180 days was requested to provide schedules and plans for the implementation of the various actions of the letter. We plan to accomplish one of the recommendations on a schedule different from that proposed in the letter. The purpose of this letter is to inform the NRC early of this plan. This is not the 180 day reply required by the generic letter.

Action IV of the generic letter requires confirmation that the service water system will perform its intended function in accordance with the licensing basis of the plant. The requested schedule is to have the confirmation completed before plant startup following the first refueling outage beginning nine months or more after the date of the letter (which is July 19, 1989).

Our next refueling outage is currently scheduled to begin in April 1990 which is nine months from the date of the letter. Thus this confirmation for WNP-2 would need to be completed by the end of this outage.

We plan to include the requested confirmation as part of a Safety System Functional Inspection (SSFI) to be performed for this system. In view of the importance that has been assigned service water performance we plan to schedule the service water SSFI as our next system to be evaluated. We will include as part of the inspection the concerns mentioned in the generic letter with particular attention given to elements of recommended Action IV. Because an SSFI requires the study of many more factors than those raised in the generic letter, we know at this time that the SSFI including the elements of Action IV will not be completed until December 1990.

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GENERIC LETTER 89-13, SERVICE WATER SYSTEM PROBLEMS  
AFFECTING SAFETY-RELATED EQUIPMENT


We believe at this time that the significant concerns raised in the generic letter do not exist at WNP-2. In anticipation of receipt of the generic letter the Supply System elected to inspect three heat exchangers during the WNP-2 1989 spring refueling outage. In this outage we inspected visually and by eddy current the service water side (tube side) of the following representative heat exchangers:

RHR A  
Hydrogen recombiner B  
Diesel Generator 1A jacket water cooler

No evidence of macrofouling was identified in any of these heat exchangers. The eddy current testing did not reveal any tube wall thinning that would indicate a problem with erosion or corrosion. With regards to the potential for single failure vulnerability of the service water system mentioned in recommended Action V, the two systems for WNP-2 are well separated electrically, spatially and functionally and as such we do not expect to uncover any concerns for confirming this criterion is satisfied.

We therefore believe that the slight schedule extension is justified in view of the broader scope that will be recognized by the performance of the SSFI and the savings in resources that will be afforded by the performance of one study.

Very truly yours,

  
G. C. Sorensen, Manager  
Regulatory Programs

AGH/bk

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