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SUBJECT: Responds to Generic Ltr 89-21 re status on implementation of  
 USI requirements.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 30, 1989  
G02-89-215

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  
RESPONSE TO GENERIC LETTER 89-21 REQUESTING  
PLANT STATUS ON IMPLEMENTATION OF UNRESOLVED  
SAFETY ISSUES

Reference: Generic Letter 89-21, "Request for Information  
Concerning Status of Implementation of Unresolved  
Safety Issue (USI) Requirements", dated 10/19/89

The reference generic letter requested our review and reporting of the status of the implementation of the Unresolved Safety Issues for which final technical resolution has been achieved and which are applicable to this facility. A thirty day response from the receipt of the letter was requested. The letter was received at the Supply System on October 30, 1989.

The response for WNP-2 in the format of mark up of Enclosure 1 of the generic letter with an attachment providing explanatory notes is attached to this letter.

Very truly yours,

*R. Letone*

*for* G. C. Sorensen, Manager  
Regulatory Programs

AGH/bk  
Attachments

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

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ENCLOSURE 1UNRESOLVED SAFETY ISSUES FOR WHICH A FINAL TECHNICAL RESOLUTION HAS BEEN ACHIEVED

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>REF. DOCUMENT</u>	<u>APPLICABILITY</u>	<u>STATUS/DATE*</u>	<u>REMARKS</u>
A-1	Water Hammer	SECY 84-119 NUREG-0927, Rev. 1 NUREG-0993, Rev. 1 NUREG-0737 Item I.A.2.3 SRP revisions	All	NC/March 1984	See Attachment A
A-2/ MPA D-10	Asymmetric Blowdown Loads on Reactor Primary Coolant Systems	NUREG-0609 GL 84-04, GDC-4	PWR	NA	
A-3	Westinghouse Steam Generator Tube Integrity	NUREG-0844, SECY 86-97 SECY 88-272 GL 85-02 (No requirements)	W-PWR	NA	
A-4	CE Steam Generator Tube Integrity	NUREG-0844, SECY 86-97 SECY 88-272 GL 85-02 (No requirements)	CE-PWR	NA	
A-5	B&W Steam Generator Tube Integrity	NUREG-0844, SECY 86-97 SECY 88-272 GL 85-02 (No Requirements)	B&W-PWR	NA	
E A-6	Mark I Containment Short-Term Program	NUREG-0408	Mark I-BWR	NA	

\* C - COMPLETE  
NC - NO CHANGES NECESSARY  
NA - NOT APPLICABLE  
I - INCOMPLETE  
E - EVALUATING ACTIONS REQUIRED

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>REF. DOCUMENT</u>	<u>APPLICABILITY</u>	<u>STATUS/DATE*</u>	<u>REMARKS</u>
A-7/ D-01	Mark I Long-Term Program	NUREG-0661 NUREG-0661 Suppl. 1 GL 79-57	Mark I-BWR	NA	
A-8	Mark II Containment Pool Dynamic Loads	NUREG-0808 NUREG-0487, Suppl. 1/2 NUREG-0802 SRP 6.2.1.1C GDC 16	Mark II-BWR	C/April 1984	See Attachment A
A-9	Anticipated Transients Without Scram	NUREG-0460, Vol. 4 10 CFR 50.62	All	I/May 1990 (See Remarks)	See Attachment A
A-10/ MPA B-25	BWR Feedwater Nozzle Cracking	NUREG-0619 Letter from DG Eisenhut dated 11/13/80 GL 81-11	BWR	C/March 1982	See Attachment A
A-11	Reactor Vessel Material Toughness	NUREG-0744, Rev. 1 10 CFR 50.60/ 82-26	All	C/March 1982	See Attachment A
A-12	Fracture Toughness of Steam Generator and Reactor Coolant Pump Supports	NUREG-0577, Rev. 1 SRP Revision 5.3.4	PWR	NA	
A-17	Systems Interactions	Ltr: DeYoung to licensees - 9/72 NUREG-1174, NUREG- 1229, NUREG/CR-3922, NUREG/CR-4261, NUREG/ CR-4470, GL 89-18 (No requirements)	All	NC	See Attachment A
A-24/ MPA B-60	Qualification of Class 1E Safety-Related Equipment	NUREG-0588, Rev. 1 SRP 3.11 10 CFR 50.49 GL 82-09, GL 84-24 GL 85-15	All	C/December 1983	See Attachment A

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>REF. DOCUMENT</u>	<u>APPLICABILITY</u>	<u>STATUS/DATE*</u>	<u>REMARKS</u>
A-26/ MPA B-04	Reactor Vessel Pressure Transient Protection	DOR Letters to Licensees 8/76 NUREG-0224 NUREG-0371 SRP 5.2 GL 88-11	PWR	NA	
A-31	Residual Heat Removal Shutdown Requirements	NUREG-0606 RG 1.113, RG 1.139 SRP 5.4.7	All OLS After 01/79.	C/March 1982	See Attachment A
A-36/ C-10, C-15	Control of Heavy Loads Near Spent Fuel	NUREG-0612 SRP 9.1.5 GL 81-07, GL 83-42, GL 85-11 Letter from DG Eisenhut dated 12/22/80	All	C/December 1983	See Attachment A
A-39	Determination of SRV Pool Dynamic Loads and Pressure Transients	NUREG-0802 NUREGs-0763,0783,0802 NUREG-0661 SRP 6.2.1.1.C	BWR	C/August 1982	See Attachment A
A-40	Seismic Design Criteria	SRP Revisions, NUREG/ CR-4776, NUREG/CR-0054, NUREG/CR-3480, NUREG/ CR-1582, NUREG/CR-1161, NUREG-1233, NUREG-4776 NUREG/CR-3805 NUREG/CR-5347 NUREG/CR-3509	All	NC/Sept. 1989	See Attachment A
A-42/ MPA B-05	Pipe Cracks in Boiling Water Reactors	NUREG-0313, Rev. 1 NUREG-0313, Rev. 2 GL 81-03, GL 88-01	BWR	C/March 1982	See Attachment A

<u>USI/MPA NUMBER</u>	<u>TITLE</u>	<u>REF. DOCUMENT</u>	<u>APPLICABILITY</u>	<u>STATUS/DATE*</u>	<u>REMARKS</u>
A-43	Containment Emergency Sump Performance	NUREG-0510, NUREG-0869, Rev. 1 NUREG-0897, R.G.1.82 (Rev. 0), SRP 6.2.2 GL 85-22 No Requirements	All	NC	See Attachment A
A-44	Station Blackout	RG 1.155 NUREG-1032 NUREG-1109 10 CFR 50.63	All	I	See Attachment A
A-45	Shutdown Decay Heat Removal Requirements	SECY 88-260 NUREG-1289 NUREG/CR-5230 SECY 88-260 (No requirements)	All	E/Sept. 1, 1992	See Attachment A
A-46	Seismic Qualification of Equipment in Operating Plants	NUREG-1030 NUREG-1211/ GL 87-02, GL 87-03	All	NA	See Attachment A
A-47	Safety Implication of Control Systems	NUREG-1217, NUREG- 1218 GL 89-19	All	E	See Attachment A
A-48	Hydrogen Control Measures and Effects of Hydrogen Burns on Safety Equipment	10 CFR 50.44 SECY 89-122	All, except PWRs with large dry containments	C	See Attachment A
A-49	Pressurized Thermal Shock	RGs 1.154, 1.99 SECY 82-465 SECY 83-288 SECY 81-687 10 CFR 50.61/ GL 88-11	PWR	NA	



ATTACHMENT AUSIRemarks

A-1

Resolution of A-1 by SECY 84-119 issued in March 1984 did not require hardware or design changes to existing plants. Regarding this USI and Enclosure 2 to GL 89-21, WNP-2 is not a BWR with an isolation condenser.

A-8

Resolution of A-8 for WNP-2 is documented in NUREG-0892 (the SER for WNP-2) and its Supplements 4 and 5 in Sections 6.2.1.8 and 3.9.3.1 respectively.

A-9

In Reference 1 the NRC states that the WNP-2 alternate rod injection system is in compliance with the ATWS rule. The reference also states that the recirculation pump trip (RPT) system requires two modifications to be in compliance with the rule. In References 2 and 3 we committed to implement the two required modifications during our spring 1990 refueling outage (currently scheduled to begin April 15, 1990). Required technical specifications will be submitted by March 1, 1990. We of course have no control over the NRC response to this technical specification change submittal and as such this is not reflected in the schedule provided.

In Reference 4 we informed the NRC that confirmation of the environmental qualification of ATWS equipment remained to be completed and that our goal was to complete this qualification on a schedule consistent with the resolution of the above mentioned RPT issue, i.e. the spring 1990 refueling outage. However, confirmation of this schedule is to be provided by December 1989.

In Reference 6 the NRC stated that the Standby Liquid Control (SLC) flow and sodium pentaborate decahydrate concentration for WNP-2 is in compliance with the ATWS rule. The SLC injection point location and its initiation are described in FSAR sections 9.3.5 and 7.4.1.2 respectively.

In October 1990 we will revise FSAR section 15.8 to include the ATWS analyses that reflects compliance to the rule.



A-10/  
MPA B-25

NRC review of WNP-2 relative to A-10 and NUREG-0619, which GL 89-21 states resolves this USI, is documented in NUREG-0892 Sections 3.9.3.1, 5.2.3.1 and 5.2.4. While these sections address A-10 they do not specifically state that the total issue is resolved for WNP-2. However, as no concerns were raised in the subsequent five supplements to NUREG-0892 and as we are not aware of a concern of the NRC's regarding A-10 subsequent to the issuance of the operating license, we believe A-10 to be resolved for WNP-2.

A-11

NRC acceptance of the WNP-2 commitment to 10 CFR 50, Appendix G is discussed in NUREG-0892, Section 5.3.1. NUREG-0744 and Generic Letter 82-26 issued subsequent to the publication of the original issue of NUREG-0892, did not require any response by licensees and only provided guidance to licensees who may be required to submit a fracture analysis to justify continued operation. This was not the case for WNP-2.

A-17

Generic Letter 89-18 issued September 6, 1989 transmitted NRC final resolution of this USI. No formal reply was required. The Supply System will incorporate information contained and referenced in this Generic Letter into the WNP-2 IPE program the results of which are due to the NRC by September 1, 1992. However as no formal action to Generic Letter 89-18 was required we consider this USI closed for WNP-2.

A-24/  
MPA B-60

In NUREG-0892 Supplement 4, Section 3.11.5, the NRC states the WNP-2 has demonstrated conformance to NUREG-0588. GL 89-21 states that Revision 1 to NUREG-0588 resolved A-24. By NRC memo J Knight to T Novak, dated November 1983 (8312120370), Mr Knight states that the WNP-2 review was to revision 1 of the NUREG.

A-31

NUREG-0892 in Section 5.4.2.1 states the WNP-2 RHR system conforms to the Commission's regulations and applicable Regulatory Guides. GL 89-21 states that A-31 was resolved in May 1978 by publication of SRP 5.4.7. As NUREG-0892 was written in March 1982 we believe this establishes closure of A-31 for WNP-2.



A-36/  
C-10,  
C-15

NUREG-0892 Supplement 4, Section 9.1.5 states that the guidelines of NUREG-0612 have been satisfied for WNP-2. GL 89-21 states that NUREG-0612 resolves A-36.

A-39

NUREG-0892 including Supplements 1 and 4 Section 6.2.1.8 provides NRC acceptance of the resolution of this issue for WNP-2.

A-40

NUREG-1233 issued September 1989 states that the proposed changes that constitute the resolution of USI-40 are to apply to new applicants only. WNP-2 is not one of the plants identified in GL 89-21 that needs to be reviewed to current requirements.

A-42/  
MPA B-05

NUREG-0892 states in Section 5.2.3.1 that WNP-2 conforms to the requirements of NUREG-0313, Revision 1 which GL 89-21 states resolves A-42. NUREG-0892, Supplement 5, Section 5.2.3.2 provides additional information on this issue.

A-43

GL 89-21 states that resolution of A-43 only applies to new plants (i.e. those reviewed after October 1985) and, as such, does not apply to WNP-2.

A-44

The WNP-2 response to SBO resolution was provided on April 17, 1989 (reference 5). The schedule for resolution of A-44 for WNP-2 can not be provided as it is partially dependent upon the NRC issuance of an SER for this response.

A-45

Per guidance provided in GL 89-21 and Supplement 9 to NUREG-0933 the Supply System will incorporate closure of A-45 into the WNP-2 IPE program the results of which are due to the NRC by September 1, 1992.

A-46

Generic Letter 87-03 issued February 27, 1987 which addresses A-46 resolution for WNP-2 did not require any action or plant review. NUREG-1211, Enclosure I established GL 87-03 as applicable to WNP-2 rather than GL 87-02. As such we consider this USI closed for WNP-2. Also NUREG-0892, Supplement 5 in Appendix C states that A-46 only applies to operating



A-47

Generic Letter 89-19 provides requirements to close A-47. The overflow protection system required of BWRs is provided for in WNP-2. The design criteria provided in the generic letter for this system are being evaluated as well as procedure requirements. The letter is to be answered by March 19, 1990. Until the above mentioned evaluation is completed a firm closure date can not be provided.

A-48

As stated in GL 89-21, A-48 is closed and implemented for Mark II BWRs such as WNP-2.

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