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SUBJECT: Responds to Generic Ltr 89-19 & Generic Ltr 89-21.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

Docket No. 50-397

G02-90-057
March 19, 1990

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

Gentlemen:

Subject: **NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
RESPONSES TO GENERIC LETTER 89-19 (TAC NO. 75019)
AND GENERIC LETTER 89-21 (TAC NO. 74538)**

References: 1) Generic Letter 89-19, Request for Action Related to Resolution of Unresolved Safety Issue A-47 "Safety Implication of Control Systems in LWR Nuclear Power Plants" Pursuant to 10CFR50.54(f), dated 9/20/89

2) Letter, G02-89-215, GC Sorensen (SS) to NRC, "Response to Generic Letter 89-21 Requesting Plant Status on Implementation of Unresolved Safety Issues", dated 11/30/89

Generic Letter 89-19

In Generic Letter 89-19 the Staff concluded that all BWR plants should provide automatic reactor vessel overfill protection, and that plant procedures and technical specifications for all plants should include provisions to verify periodically the operability of the overfill protection and to assure that automatic overfill protection is available to mitigate main feedwater overfeed events during reactor power operation. In Enclosure 2 to the generic letter, the Staff outlined a number of designs that satisfy the objectives for overfill protection.

In addition, the Staff recommended that all BWR recipients reassess and modify (if needed) their operating procedures and operator training to assure that the operators can mitigate reactor vessel overfill events that may occur via the condensate booster pumps during reduced system pressure operation. Enclosure 2 (Sections 1 through 4, a and b) describes the requested action for the different NSSS designs.

The generic letter required that a response be provided to the NRC within 180 days of the date of the letter (September 20, 1989). The purpose of this letter is to provide that response.

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1) GE Boiling Water Reactor Plants

a. The WNP-2 design provides automatic vessel overfill protection to mitigate main feedwater (MFW) overfeed events. The design for the overfill protection system is sufficiently separate from the MFW control system to ensure that the MFW pump will trip on a reactor high-water-level signal when required even if a loss of power, a loss of ventilation, or a fire in the control portion of the MFW control system should occur.

The Supply System has reassessed our operating procedures as well as our operator training with respect to the requirements contained in the generic letter relative to mitigating reactor vessel overfill events and determined that they are adequately addressed as presently written. No modifications are necessary.

b. The WNP-2 Technical Specifications for surveillance intervals and limiting conditions for operation (LCO) for overfill protection, Technical Specification 3/4.3.9 Feedwater System/Main Turbine Trip System Actuation Instrumentation, were previously approved and issued as original issue technical specifications. These are adequate to periodically verify the operability of overfill protection and ensure that automatic overfill protection to mitigate main feedwater overfill events is operable during power operation. No further actions are necessary.

2) Designs for Overfill Protection

The WNP-2 design for overfill protection meets or exceeds the requirements for a Group I plant. The logic associated with the RFP High Level Trip (excluding the shared level transmitter) is separate from the control portion of the MFW control system and is of the fail-safe, two-out-of-three logic scheme that isolates MFW flow by tripping the MFW pumps. This logic is supplied from two divisionally separate cabinets with independent power supplies.

There have been two separate instances where the overfill protection system has been challenged. During both events, the RFP High Level Trip functioned as designed (see LERs 86-025-01 and 87-002).

The WNP-2 MFW overfill protection system design is essentially unchanged from that initially reviewed and approved prior to plant startup. Evidence of system approval can also be found in Table A.1, Appendix A to NUREG-1218, which describes WNP-2 as "BWR plants with automatic overfill protection equivalent to or better than the reference plant design."

STATE OF WASHINGTON)

COUNTY OF BENTON)

Subject: RESPONSE TO GL 89-19 AND GL 89-21

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 19 MARCH, 1990

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 19th day of March 1990.

Linda N. Wilson
Notary Public in and for the
STATE OF WASHINGTON

Residing at Richland
My commission expires 7/20/92

This completes the Supply System's response to Generic Letter 89-19.

Generic Letter 89-21

Reference 2 provided our response to Generic Letter 89-21 that requested information relative to the implementation of Unresolved Safety Issues (USI) on a plant specific basis. Reference 2 stated that until our review of Generic Letter 89-19 was completed we could not conclude that USI A-47 was implemented. Based upon the above discussion and the lack of any need for additional action relative to A-47 for WNP-2 we conclude that this USI is implemented for WNP-2.

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