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 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System
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SUBJECT: Requests extension of comment period on NUREG-1434, "STS" until 910531.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

March 5, 1991
G02-91-045

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
REQUEST FOR EXTENSION OF COMMENT PERIOD ON
NUREG 1434, STANDARD TECHNICAL SPECIFICATIONS

Reference: Federal Register, same subject, page 5427,
dated February 11, 1991

The reference provided notice of the subject draft NUREG and authorized a thirty day working period (until March 15, 1991) for the industry to submit comments prior to document finalization. The Supply System, since March 1990, has been developing Improved Technical Specifications (ITS) for WNP-2 in anticipation of the release of the subject document. Additionally the Supply System has been represented at NUMARC/NRC/Industry Owner's Group meetings over the period January through July, 1990. The express purpose of these meetings was the development of the foundation for the subject document. Since the completion of these meetings the Staff has been sequestered more than five months developing the draft NUREG. It appears that the Staff has extensively modified the foundation agreed to by NUMARC, the NRC and the Industry Owner's Groups.

The document is extremely large, significant deviations have been added over the preceding five months, and to allot a review period of such brevity is short sighted. Based on our initial review of the significant deviations, a thirty day comment period is far too short to develop an adequate, comprehensive response. The imposition of such a large document without thorough review by the operators, technicians and engineers that must work with the document on a day-to-day basis is not prudent and exposes the Staff and Industry to problems similar to those experienced with the present Technical Specifications. Such an imposition, without a thorough review does not allow the operators to determine if it is a

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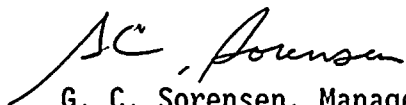
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REQUEST FOR EXTENSION OF COMMENT PERIOD
ON NUREG 1434, STANDARD TECHNICAL SPECIFICATIONS

useable document or that it does not represent an undue hardship to plant operation. Given the significant changes identified to date it is not clear that the document can receive an adequate review that fully utilizes the resources spent and background developed by the Staff and Industry over the past years. A thorough review is essential to the success of the program.

Accordingly, the Supply System is requesting that the Industry and Supply System be allotted more time for review of this draft NUREG and the significant deviations therein. This requested extension will provide time to ensure a proper and thorough review by personnel who will be tasked with implementing and using the Improved Technical Specifications. The proposed extension date for submittal of comments is May 31, 1991. While this is an extension request of greater than two months, it is believed that this is the minimum time necessary to perform an adequate review.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP/bk

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
PL Eng - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A
D Hoffman - EXCEL

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