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 SORESEN, G.C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Responds to generic ltr 91-11, re resolution of generic issues 48, "LCO's for Class 1E Vital Instrument Buses," & 49, Interlocks & LCO's for Class 1E Tie Breakers."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

December 5, 1991
G02-91-222

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 91-11, RESOLUTION OF GENERIC ISSUES 48,
"LCOs FOR CLASS 1E VITAL INSTRUMENT BUSES," AND 49, "INTERLOCKS AND
LCOs FOR CLASS 1E TIE BREAKERS" PURSUANT TO 10 CFR 50.54(f)

Reference: Generic Letter, 91-11, JG Partlow (NRR) to All Holders of Operating
Licenses, same subject, dated July 18, 1991

The reference requested assurance that Licensees have procedures for control of time limitations and surveillance requirements for vital instrument buses, inverters or other power sources to vital instrument buses, and tie breakers between redundant Class 1E buses. It further stated that implementation of the Standard Technical Specifications, such as those implemented on recently licensed plants, resolved the concerns addressed in the generic letter. WNP-2, as part of initial licensing, implemented the Standard Technical Specifications. Specifically, Technical Specification Limiting Conditions for Operation 3.8.3.1 and 3.8.3.2 "Onsite Power Distribution Operating" and "Shutdown" address these issues. Accordingly, the concerns of the generic letter were met for WNP-2 with implementation of the Standard Technical Specifications.

The Supply System has reviewed the concerns expressed in the generic letter, the related WNP-2 Technical Specifications and appropriate plant implementing procedures. Weekly breaker alignment checks verify the operability and availability of power supplies and direct the operator to compensatory actions and/or time limitations for off normal conditions. These surveillance procedures also measure the voltages at these buses and assure that they meet defined acceptance criteria. Further, during periods where it is necessary to provide temporary power from off normal sources such as during an outage, plant procedures require completion of a 10CFR 50.59 review and, if required, a safety evaluation. Also WNP-2 has no tie breakers capable of cross connecting redundant Class 1E buses.

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RESPONSE TO GENERIC LETTER 91-11, RESOLUTION OF GENERIC
ISSUES 48 AND 49

In summary, plant design, the implementation of Standard Technical Specifications, and plant operating procedures resolve the concerns identified in the referenced generic letter.

Very truly yours,

Alan Sorensen

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

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Response to
Generic Letter 91-11

I, A. G. HOSLER, being duly sworn, subscribe to and say that I am the Manager, WNP-2 Licensing, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the 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 December 5, 1991

Alan Hosler
A. G. Hosler, Manager
WNP-2 Licensing

On this date personally appeared before me A. G. HOSLER, 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 5th day of December 1991.

Brian Kasko
Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994

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