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SORSSEN, G.C. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
MARTIN, J.B. Region 5 (Post 820201)

SUBJECT: Discusses implementation of Phase II emergency operating procedures, per Insp Rept 50-397/91-27 & corrective action plan for licensed operator requalification program. Proposes that Phase I of procedures be used through Nov 1992 exam.

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REGION V

June 1, 1992

GO2-92-133

Docket No. 50-397

J. B. Martin, Regional Administrator
U. S. Nuclear Regulatory Commission
Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Dear Mr. Martin:

Subject: **NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21,
IMPLEMENTATION OF PHASE TWO EMERGENCY OPERATING
PROCEDURES**

- References:
- a) Letter GO2-91-214, dated November 21, 1991, G.C. Sorensen (Supply System) to USNRC, "Response to NRC Inspection Report 91-27"
 - b) Letter GO2-92-010, dated January 14, 1992, G.C. Sorensen (Supply System) to J.B. Martin (NRC), "WNP-2 Licensed Operator Requalification Training Program Corrective Action Plan Revision Eight"
 - c) Letter dated March 17, 1992, D.F. Kirsch (NRC) to G.C. Sorensen (Supply System), "WNP-2 Response to NRC Inspection Report No.91-27"

In References (a) and (b), the Supply System committed to complete the Phase Two Emergency Operating Procedures (EOP) upgrades by the end of June 1992. WNP-2 licensed operators would then be trained on the Phase Two EOP's and tested using the Phase Two EOP's in the November 1992 requalification exam.

Reference (c) noted that the U. S. Nuclear Regulatory Commission (NRC) was interested in the progress of our long term EOP upgrade program and requested that the NRC be kept appraised of the results of these efforts. The purpose of this letter is to provide a status report on the work and our implementation plans.

Work on the Phase Two EOP's continues to proceed on schedule, and will be complete the end of June 1992. Beginning in early July, the Phase Two EOP's will be validated in training exercises on the WNP-2 simulator. Any changes required will be incorporated by the end of July 1992. Upon further review of the work required to incorporate Phase Two EOP's in the requalification exam to be given in November 1992, we are proposing that the Phase One EOP's continue to be used through the November 1992 requalification exam.

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Mr. J. B. Martin

June 1, 1992

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IMPLEMENTATION OF PHASE TWO EMERGENCY OPERATING PROCEDURES

This decision was reached following a critical evaluation of the preparation required to prepare training modules and conduct training for all crews on Phase Two EOP's prior to the requalification exams. Based on lessons learned from our experience with the Phase One EOP upgrades, we are concerned that attempting to rush the implementation of Phase Two EOP upgrades into the November 1992 requalification exam would not be prudent.

The new license candidates currently in training will be trained and evaluated using the Phase Two EOP upgrades and Phase Two upgrades will be used in their license exams scheduled for March 1993. Training cycles for current WNP-2 licensed operators will begin to use Phase Two EOP upgrades after the November 1992 requalification exams. Our plan is to expose each operating crew to at least three training cycles using Phase Two EOP's, at which time we would be prepared to implement Phase Two EOP's in the plant. Assuming that the training on Phase Two EOP's begins in late 1992, we expect to implement Phase Two EOP's in July 1993. As was discussed in our Regional meeting May 15, we will attempt to implement Phase Two EOP's earlier if possible.

The training schedule outlined will create a situation where the new licensed operators will have been trained on Phase Two EOP's and Phase One EOP's are still in use at the plant. We will assure that all licensed operators assigned control room responsibilities are adequately familiar with the EOP's in use at the plant to carry out their emergency functions.

It is our understanding that the NRC is planning to conduct a followup EOP inspection at WNP-2 at some future date. We propose that the inspection be conducted following implementation of the Phase Two EOP upgrades in mid-1993.

Following completion of the initial operator license exams in March 1993, it is our plan to return operation of WNP-2 to a six crew rotation schedule.

The Supply System has evaluated the potential safety impacts of the revision to the schedule for implementation of Phase Two EOP upgrades and we have concluded that with the enhancements that have been made with the Phase One upgrades and current level of training, the delay in implementation of Phase Two will not adversely impact public health and safety.



Mr. J.B. Martin

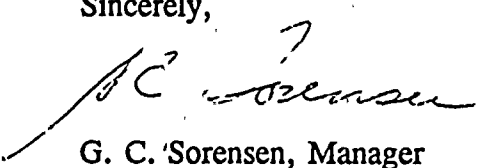
June 1, 1992

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IMPLEMENTATION OF PHASE TWO EMERGENCY OPERATING PROCEDURES

Should you have any questions regarding this letter, please contact Mr. S.L. McKay at (509) 377-8264.

Sincerely,


G. C. Sorensen, Manager

Regulatory Programs (Mail Drop 280)

cc: WM Dean, Nuclear Regulatory Commission
Document Control Desk, Nuclear Regulatory Commission
NS Reynolds, Winston & Strawn
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