

ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9210060128 DOC. DATE: 92/09/28 NOTARIZED: YES DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Responds to GL 92-04, "Resolution of Issues Related to
 Reactor Vessel Water Level Instrumentation in BWRs Pursuant
 to 10CFR50.54(f)."

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 7
 TITLE: OR Submittal: General Distribution

NOTES:

RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
PD5 LA	1 1	PD5 PD	1 1
DEAN, W.	2 2		
INTERNAL: ACRS	6 6	NRR/DET/ESGB	1 1
NRR/DOEA/OTSB11	1 1	NRR/DST/SELB 7E	1 1
NRR/DST/SICB8H7	1 1	NRR/DST/SRXB 8E	1 1
NUDOCS-ABSTRACT	1 1	OG/LEMB	1 0
OGC/HDS1	1 0	REG FILE 01	1 1
RES/DSIR/EIB	1 1		
EXTERNAL: NRC PDR	1 1	NSIC	1 1

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK.
 ROOM P1-37 (EXT. 504-2065) TO ELIMINATE YOUR NAME FROM DISTRIBUTION
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 22 ENCL 20

MAY



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

September 28, 1992
G02-92-229

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NPF-21
RESPONSE TO GENERIC LETTER 92-04, RESOLUTION OF THE ISSUES
RELATED TO REACTOR VESSEL WATER LEVEL INSTRUMENTATION IN BWRs
PURSUANT TO 10 CFR 50.54(f)

- References: 1) Letter, BWROG-92072, GJ Beck (BWROG) to WT Russell (NRR),
"Reactor Vessel Water Level Instrumentation", dated August 12,
1992
- 2) Letter, BWROG-92082, GJ Beck (BWROG) to NRC, "Reactor Vessel
Water Level", dated September 24, 1992

The attachment represents the results of the Supply System review of the subject
Generic Letter (GL) and includes the Supply System response to the specific
Requested Actions in the GL for WNP-2.

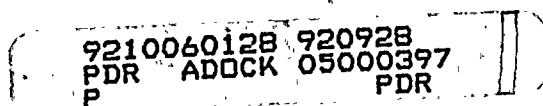
Sincerely,

G. C. Sorensen

G. C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

PLP/bk

cc: JB Martin - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A



ADD 1

1990

ATTACHMENT

Requested Action 1

1. In light of potential errors resulting from the effects of noncondensable gas, each licensee should determine:
 - a. The impact of potential level indication errors on automatic safety system response during all licensing basis transients and accidents;
 - b. The impact of potential level indication errors on operator's short and long term actions during and after all licensing basis accidents and transients;
 - c. The impact of potential level indication errors on operator actions prescribed in emergency operating procedures or other affected procedures not covered in (b).

Response

- 1.a The BWR Owners' Group (BWROG) provided to the NRC and each of the member utilities a report on BWR Reactor Vessel Level Instrumentation, Revision 1, August 28, 1992. This report addresses the safety impact of potential water level indication errors on automatic system response during all licensing basis transients and accidents. This analysis basis is contained in Section 6.0, Safety Analysis of the report and is summarized in Section 2.2, Plant Response to Postulated Accident Scenarios. The information in the BWROG report is applicable to the design of WNP-2; this conclusion is based on our review of the report and the evaluation made by General Electric as contained in Attachment 2 to the report. The Supply System recognizes that there are differences between the designs of BWR plants and systems; however our review of the report and the Attachment 2 conclusions reinforces the Supply System's general understanding that the basic plant response to the design basis transients and accident events is sufficiently similar to obviate the need for additional plant unique detailed re-analysis. Also this conclusion is sufficiently conservative to include WNP-2 which was licensed to less realistic analytical bases than those that are accepted today by the NRC.
- 1.b The BWROG report addresses, in Section 6.9, Operator Responses, the operator actions that could be anticipated in response to potential water level indication errors. In the short term the report discusses in Section 6.0 that the automatic safety actions will be performed as necessary. Additional guidance has been provided to plant operations personnel as a result of the Emergency Procedures Committee (EPC) recommendations letter of August 19, 1992. Once available, this sensitizing guidance was provided to the operators as part of their shift turnover activities, as they came back on duty, in the form of Required Reading for each operator. The interim guidance information has sensitized the operators to the possible concerns with accurate water level readings following a rapid depressurization while not necessitating

a change to the existing long term guidance provided in the Emergency Operating Procedures (EOP). As stated in the BWROG report in Section 6.4.1 there have not been any identified rapid depressurization events like initiation of the Automatic Depressurization System (ADS); there is only a small likelihood of such a challenging event. At WNP-2, Plant Procedure PPM 5.5.19, "RPV Draining to Restore RPV Level Indication," provides direction to the operator for backfilling the reference legs of water level instrumentation. This procedure is available for the operator to assure the recovery of any instrumentation that may have lost water level indication.

- 1.c As stated in Section 6.9 of the report, the 1.b response above, and the Reference 2 letter, the operators have adequate information in the present EOPs as augmented by the recent sensitization information communication from the EPC. The EPC is continuing to review the potential need for any additional guidance in the Emergency Procedure Guidelines (EPG) to further address the potential water level indication errors. Such review will take into account the information from the BWROG program of analysis and testing regarding this issue.

Requested Action 2

2. Based upon the results of (1), above, each licensee should notify the NRC of short term actions taken, such as:
- a. Periodic monitoring of level instrumentation system leakage; and
 - b. Implementation of procedures and operator training to assure that potential level errors will not result in improper operator actions.

Response

- 2.a The concern for periodic leakage monitoring will be evaluated as part of the BWROG action plan.
- 2.b The Supply System has informed its operators of the information contained in the letter from the EPC. The existing information about the configuration of the cold leg water level instrumentation has been reviewed and additional verification will take place at the next refueling outage. The available information has been provided to the BWROG to be factored into the test configurations in the BWROG program (provided to the NRC in the August 12, 1992 letter from the BWROG). The significance of different characteristics of the configuration or cold leg water level instrumentation will be better understood after the BWROG program test information is available.

The response to 1.b discusses procedures and operator training to assure that potential level errors will not result in improper operator actions.

Requested Action 3

Each licensee should provide its plans and schedules for corrective actions, including any proposed hardware modifications necessary to ensure the level instrumentation system design is of high functional reliability for long term operation. Since this instrumentation plays an important role in plant safety and is required for both normal and accident conditions, the staff recommends that each utility implement its longer term actions to assure a level instrumentation system of high functional reliability at the first opportunity but prior to starting up after the next refueling outage commencing 3 months after the date of this letter.

Response

The Supply System endorses the BWROG plans originally provided in the BWROG letter to the NRC on August 12, 1992 (Reference 1). The Supply System also reaffirms support of the BWROG plan by endorsing the BWROG letter of September 24, 1992 (Reference 2). WNP-2 is scheduled to start the next refueling outage on April 15, 1993. If the BWROG Program indicates that modifications are necessary to assure that the level instrumentation is of high functional reliability, a schedule will be provided to the NRC at that time.

