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 AUTH. NAME      AUTHOR AFFILIATION  
 PARRISH, J.V.      Washington Public Power Supply System  
 RECIP. NAME      RECIPIENT AFFILIATION  
                          Document Control Branch (Document Control Desk)

SUBJECT: Responds to NRC Bulletin 93-003. Both procedure instructions  
 & installed interlocks preclude simultaneous opening of  
 valves in RHR lines that could lead to RPV drain down event  
 while shutdown..

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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June 9, 1993  
G02-93-143

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 NRC BULLETIN 93-03

Reference:   Letter G02-93-113, dated May 17, 1993, JV Parrish (SS) to NRC,  
              "LER 93-009-01"

This letter, in response to NRC Bulletin 93-03, discusses the short term corrective actions taken by the Supply System as compensatory measures for dealing with Reactor Pressure Vessel (RPV) level notching. Additionally, as discussed at the meeting between the NRC staff and WNP-2 staff on May 26, 1993, it serves to clarify the response to be taken by the plant staff in the event of indication of degassing in the RPV condensing chamber sensing lines.

The bulletin requested that short term compensatory actions be implemented including enhanced monitoring of level instrumentation, enhanced procedures and restrictions to preclude inadvertent draining of the RPV during MODE 3, and alerting operators of potentially confusing plant parameters during accidents or transients. As discussed in the reference, actions have been taken to ensure that RPV level instrumentation is closely monitored during depressurization from 450 psig until the plant is in cold shutdown. Plant procedures that control actions to shut down and cool down the plant have been revised to provide operators instructions for enhanced monitoring, to provide guidance on the recognition of the condition, and to provide actions to be taken in the event the condition is observed. The details of the corrective actions completed are contained in the reference.

These topics were discussed further during the May 26, 1993, meeting. It was explained that the Supply System believes that there is a correlation between the severity of the degassing phenomena and the pressure at which the indications of notching are initially observed. Criteria have been established to clearly define an "unacceptable" notch; a notch of a size and duration such that the associated instrumentation can no longer be considered operable. Guidance will

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also be provided to the Shift Managers and those individuals who will assist in monitoring the level instrumentation (Technical Advisors) concerning the potential severity of the level perturbations and any actions that should be taken to assure the operability of instrumentations prior to the detection of unacceptable notch.

As discussed in the meeting, both procedure instructions and installed interlocks at WNP-2 preclude the simultaneous opening of the valves in the RHR lines that could lead to an RPV drain down event while shutdown.

Training of the operating crews and the individuals assigned to assist in monitoring RPV level indications has been completed. Additional information concerning the determination of operability of the instrumentation upon the first indication of potential level perturbations will be provided to the Shift Managers and the Technical Advisors. This additional training will be completed prior to startup following the current refueling outage.

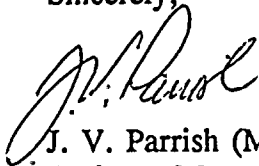
Another short term compensatory action discussed in the bulletin is the augmented training on the loss of RPV inventory scenarios. As discussed above and in the reference, the Supply System has completed training of the operating crews on the indications of and the effects caused by the degassing of the reference legs of the RPV level instrumentation. Additional training of the Shift Managers and the Technical Advisors will be conducted prior to startup. This will include information on the relationship between the pressure at which the first indication of notching is observed, the potential severity of the inaccuracies, actions to be taken, and the operability of the associated instrumentation. Each crew has been exposed to simulator training for RPV drain down events while shutdown and additional classroom training will be used to enhance operator knowledge and skill when responding to events that may result from the perturbations in level indications. This training will be completed during the next requalification training cycle, scheduled to end in September 1993. It should be noted that although loss of inventory scenarios will be used in simulator training, the simulator at WNP-2 is not capable of simulating the effects of the notching phenomenon on emergency systems.

In accordance with the directions in the NRC bulletin, the Supply System has initiated design changes to provide a constant back fill for the RPV reference legs. This modification will connect the discharge of the Control Rod Drive (CRD) System pumps to the process instrumentation tubing associated with five condensing chambers on the RPV. As requested by the NRC bulletin, the Supply System plans to implement these hardware modifications during the first cold shutdown after July 30, 1993.

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RESPONSE TO NRC BULLETIN 93-03

In summary, the Supply System, with one exception, has implemented the short term corrective actions requested in NRC Bulletin 93-003. The details of these actions are contained in the reference. The remaining action, additional training for the Shift Managers and the individuals assisting in level monitoring, will be completed prior to startup following this outage. The written report confirming completion of the hardware modifications and describing the modification will be submitted in accordance with the schedule established in NRC Bulletin 93-03.

Sincerely,



J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations

MGE/bk

cc: BH Faulkenberry - NRC RV  
NS Reynolds - Winston & Strawn  
JW Clifford - NRC  
DL Williams - BPA/399  
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STATE OF WASHINGTON )  
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Subject: Response to NRC Bulletin 93-03

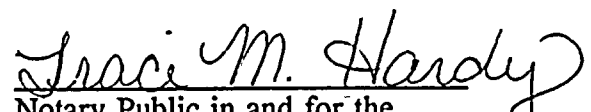
I. J. V. PARRISH, being duly sworn, subscribe to and say that I am the Assistant Managing Director, Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE 9 June, 1993

  
J. V. Parrish, Assistant Managing Director  
Operations

On this date personally appeared before me J. V. PARRISH, 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 9<sup>th</sup> day of June 1993.

  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires Aug. 9, 1995