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 AUTH. NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Responds to NRC Bulletin 93-003. Requests that scheduled date for implementation of bulletin be extended from 930730-0915.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

July 26, 1993
G02-93-190

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**

- References: 1) Letter dated June 9, 1993, JV Parrish (SS) to NRC, same subject
2) Letter dated July 2, 1993, JV Parrish (SS) to NRC, "Licensee Event Report No. 93-009-02"

In Reference 1, the Supply System committed to the hardware implementation schedule specified in NRC Bulletin 93-03. However, as the design and implementation phases of the modification have progressed, we are able to more accurately forecast a completion date. Due to unavoidable lead times, if the modification proceeds as currently scheduled, and WNP-2 is in cold shutdown on July 30, 1993, the final stages of installation could not begin until August 22 and could not be completed until August 30, 1993. This would result in an unwarranted delay in restart. Two factors of particular concern drive the possible delay in restart. They are the material procurement and the design completion following testing. The final installation phases, that must be completed during a plant outage, cannot begin until the final design is issued. The design completion is dependent upon testing results. The onsite testing has not yet started. The test equipment is being built, but crucial components are not expected to arrive until August 2, 1993. The Supply System is requesting that the schedule for the modification be extended from the first cold shutdown after July 30 to the first cold shutdown after September 15, 1993. The schedule extension would not present a safety issue, as the phenomena has been evaluated and corrective actions have been taken to preclude the occurrence and to mitigate the potential effects of level notching as discussed in Reference 2. The following provides, as the bases for the extension request, a summary of the critical path activities and schedule based upon a cold shutdown on July 30.

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- 1) The flow indicators and pressure regulators are expected to arrive on site on August 2. A WNP-2 test procedure is being written and equipment needed to test the design is being built to support the evaluation of the proposed design effects of CRD system pressure oscillations. The plant unique test is scheduled for completion on August 14.
- 2) Depending on the satisfactory results of the plant unique testing and the evaluation performed in accordance with 10CFR50.59, the final design packages and field work instructions would be issued on August 22.
- 3) The installation and preoperational testing are scheduled to be completed 8 days after issuing the work instructions, with the systems being declared operable on August 30, 1993.

These schedule dates do not contain contingencies for problems or delays and thus do not represent commitments. The times and dates demonstrate that even under the best of circumstances, adherence to the July 30, 1993 deadline would result in extending a shutdown by at least a month. For example, a shutdown to repair a condenser tube leak could be completed in less than 72 hours. The impact of a forced outage, similar to this, occurring prior to October would represent a significant hardship for the Supply System and the Bonneville Power Administration.

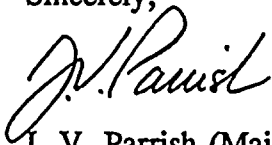
In requesting the schedule extension, the Supply System believes that it is important that the NRC understand this is an aggressive schedule. Several outstanding open issues that could impact the completion of the modification are as follows:

- 1) results of the plant unique testing being performed to evaluate the effects of the CRD system pressure changes; unacceptable test results may result in changes to final design packages which could affect projected schedule completion;
- 2) impact of the latest EPRI test evaluation;
- 3) outcome of the evaluation completed in accordance with 10CFR50.59;
- 4) potential that some of the level instrumentation may need to be replaced to accommodate the impact of the CRD system flow and temperature effects;
- 5) potential for equipment procurement and shipment delays; and
- 6) results of WNP-2 plant specific stress analysis of the affected reactor nozzles. This analysis will be performed using General Electric supplied guidelines that will not be made available to BWR utilities until August 13.

Page Three
RESPONSE TO NRC BULLETIN 93-03

In summary, the Supply System has made a substantial effort to complete the tasks that can be accomplished prior to a plant outage in order to expedite the plant restart after July 30, 1993. In spite of this, the current schedule could not support a restart until after August 30, 1993. The August 30 date has been established by a very aggressive and optimistic schedule, that only allows eight days for installation and testing that must be done during a plant outage. Based upon the significant progress to date, the number of open issues, and the corrective actions taken, the Supply System believes that the extension of the deadline from July 30, to September 15 is justified.

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
NRC Site Inspector - 901A

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

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.

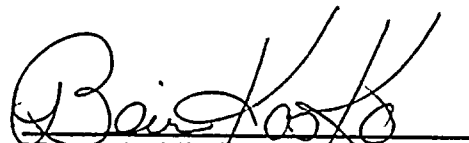
DATE 26 July, 1993



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 26 day of July 1993.



Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994