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SUBJECT: Responds to NRC concerns re plant specific deviation from
 generic BWROG DWL Spray Initiation Limit curve
 (Design Deviation 17), per EOPs.

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August 5, 1993
G02-93-199

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**
 EMERGENCY OPERATING PROCEDURES OUTSTANDING CONCERNS

References: 1) Letter, dated April 12, 1993, LF Miller (NRC) to GC Sorensen (SS),
 "Outstanding Concerns"
 2) Letter G02-91-214, dated November 21, 1991, GC Sorensen (SS) to
 NRC, "NRC Inspection of WNP-2 Emergency Operating Procedures
 (NRC Inspection Report No. 91-27)"

This letter serves to respond to the two outstanding concerns discussed in Reference 1. The NRC expressed concern regarding the plant specific deviation from the generic Boiling Water Reactor Owners Group (BWROG) Drywell Spray Initiation Limit (DWSIL) curve (Design Deviation 17). The NRC also described a conditional acceptance of a deviation from Emergency Procedure Guidelines (EPG's) Caution 1 (Implementation Deviation 2).

With respect to the first concern, in Reference 1, the NRC stated, "the Supply System should ensure that changes to this curve are consistent with its purpose developed by the BWROG." The design basis scenario which causes a conflict with the BWROG version of the DWSIL curve produces a containment atmospheric condition significantly different from the conditions assumed in the generic DWSIL calculation. The WNP-2 DWSIL calculation was modified to allow the use of drywell sprays in a saturated drywell atmosphere at high pressure, as opposed to the 0% humidity assumed in the generic calculation. This scenario is outside the confines of the generic methodology, but it is not in conflict with the guidelines or with the purpose established by the

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EMERGENCY OPERATING PROCEDURES OUTSTANDING CONCERNS

BWROG. The Supply System believes that by allowing the use of the sprays in this small additional region of the pressure-temperature map, some drywell heating scenarios can be mitigated to a greater extent than possible if limited by the generic curve. No adverse safety consequences have been identified as a result of this deviation. In addition to the plant specific calculations performed, the Supply System has been communicating with and participating in the BWROG EOP committee (EPC-II). EPC-II is evaluating whether any generic calculations need to be performed for the high humidity, high pressure scenarios. WNP-2 will evaluate the decision arrived at by the EPC-II.

With respect to the second concern, the NRC stated in Reference 1 that it found Implementing Deviation 2 acceptable "provided that (1) the measured temperature in the general area of the instrument lines is below RPV saturation temperature, and (2) the level instrument reads above a minimum indicated level."

The Supply System phase II EOP's provide for these conditions as follows:

a. Instrument Run Temperatures:

WNP-2 has completed a substantial effort to ensure that adequate information is available to the Operators to respond to Caution 1 of the EOPs. This effort recognized that at WNP-2, only Fire or High Energy Line Beaks can result in area temperatures high enough (200°F or above) to place the usability of the level instrumentation in question. This resulted in the adoption of an abnormal condition procedure titled "HELB" and revisions to the abnormal condition procedure titled "Fire." These procedures have been referenced in the WNP-2 EOPs under Caution 1. They provide data to enable the Operator to arrive at a conservative conclusion as to which of the level instruments may be suspect whenever conditions which can cause high area temperatures are present and specifically caution operators in the use of the instrument that could have been affected.

It is to be noted that most BWRs rely on reentry teams to provide the Operators with information regarding temperatures in the areas containing instrument line runs. The procedures noted above augment this response. They are in recognition of the fact that post-event access to the Reactor Building may not always be available and provide a means for the Operator to implement Caution 1, if necessary, under such conditions.

EMERGENCY OPERATING PROCEDURES OUTSTANDING CONCERNS

It is also to be noted here that in common with most BWRs, the original design of WNP-2 does not support the capability to directly monitor the areas in the immediate vicinity of all instrument lines. Neither does it support the capability to monitor general area temperatures specific to the vicinity of the level instrument lines. Remote temperature indication for selected areas containing high energy piping and a single Reactor Building temperature, as measured at the inlet to the SGT system, are available. Similarly, remote indication of fire conditions exist. The abnormal condition procedures noted in the previous paragraphs are predicated upon indication from these sources.

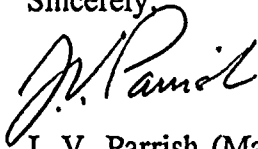
WNP-2 believes that the approach detailed above conservatively provides for situations under which the area temperatures may, even potentially, be above the RPV saturation value.

b. Minimum Indicated Level:

WNP-2 has calculated and established "minimum indicated levels" in accordance with methodology outlined in revision 4 to the EPG's. These calculated values are utilized in the WNP-2 EOP's. However, for simplicity and human factor considerations, one limiting MIL value is provided for each level instrument which bounds the worst case combination of temperature extremes in the routing areas of the instrument lines (i.e., drywell and Reactor Building). Since only this one limiting value is provided, it has been redefined in the WNP-2 EOP's as the "minimum useable level," to avoid confusion with the EPG MIL value.

We believe the above outline approach meets the intent of the generic EPG with respect to RPV Water Level Instruments and makes that guidance implementable at WNP-2.

Sincerely,



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

MGE/GR/bk

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