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ACCESSION NBR: 9310200330 DOC. DATE: 93/10/14 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME: PARRISH, J.V. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Informs that since time of submittal of change re removal of
 MSL radiation monitor scram & isolation valve closure
 functions from TS, until identified additional impacts change would
 have on EOPs, w/regard to implementation of OL Amend 112.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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October 14, 1993
G02-93-252

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
IMPLEMENTATION OF OPERATING LICENSE AMENDMENT 112
REGARDING REMOVAL OF MAIN STEAM LINE RADIATION
MONITOR SCRAM AND ISOLATION VALVE CLOSURE FUNCTIONS
FROM TECHNICAL SPECIFICATIONS (TAC NO. M82061)**

- References:
- 1) Letter, dated January 26, 1993, JW Clifford (NRC) to GC Sorensen (SS), "Issuance of Amendment for the Washington Public Power Supply System Nuclear Project No. 2 (TAC No. M82061)"
 - 2) NEDO-31331, dated March 1987, "BWR Owner's Group Emergency Procedure Guidelines," Revision 4, General Electric Company
 - 3) Letter, dated September 12, 1988, AC Thadani (NRC) to Donald Grace (BWROG), "Safety Evaluation of 'BWR Owner's Group - Emergency Procedure Guidelines, Revision 4' NEDO 31331, March 1987"

By Reference 1, the NRC provided Amendment No. 112 to the WNP-2 Operating License providing for removal of the main steam line radiation monitor scram and isolation valve closure functions from the Technical Specifications.

Since the time of the submittal of this requested change, the Supply System and the BWROG have identified additional impacts the change would have on the Emergency Operating Procedures. Currently, Reference 2 takes credit for the main steam line isolation function as a barrier that limits release of radioactive material to the environment. This is acknowledged

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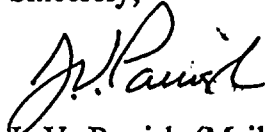
**IMPLEMENTATION OF OPERATING LICENSE AMENDMENT 112
REGARDING REMOVAL OF MAIN STEAM LINE RADIATION
MONITOR SCRAM AND ISOLATION VALVE CLOSURE FUNCTIONS
FROM TECHNICAL SPECIFICATIONS (TAC NO. M82061)**

in Reference 3. Page 44 of the SER states that "(i)f MSIVs are closed due to low RPV water level, the interlocks are bypassed to open the MSIVs (other interlocks such as isolation on high radiation are not bypassed)." If this barrier is removed or defeated, then a comparable barrier or action must be added to ensure protection against release of radioactive material.

At a meeting of the BWROG Emergency Procedure Committee-II March 31 - April 2, 1993, this issue was discussed and action was assigned to evaluate necessary changes to the EPGs.

The Supply System does not believe that it would be appropriate to process the required procedure changes to implement Amendment 112 solely under the provisions of 10CFR50.59. We believe that an EPG change should be pursued through the BWROG to address the removal of these functions. Also, while the hardware aspects of this change could be implemented during power operation, we are reluctant to perform the required modifications in the cabinets containing the associated trip logic while at power. Therefore, to allow for the needed modifications to be completed during a scheduled outage, and to allow time for resolution of the EPG concerns through the BWROG, we plan to implement the change in the April 1994 refueling outage currently scheduled to be completed in June 1994.

Sincerely,



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

AGH/bk

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

