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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: Submits response to Suppl 3 to GL 89-10 re NRC Insp Rept
50-397/93-23.

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TITLE: Response to Generic Ltr 89-10, "Safety-Related MOV Testing & Surveill

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 14, 1994
G02-94-084

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
SUPPLEMENTAL RESPONSE TO GENERIC LETTER 89-10,
SUPPLEMENT 3**

- References:
- 1) Letter G02-93-217 dated August 31, 1993, JV Parrish (SS) to NRC, "Generic Letter 89-10 and Supplements"
 - 2) Letter dated October 29, 1993, LF Miller (NRC) to JV Parrish (SS), "Notice of Violation (NRC Inspection Report No. 50-397/93-23)"
 - 3) Letter dated February 8, 1994, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specification Table 3.6.3-1, Primary Containment Isolation Valves"

Reference 1, Attachment A states that RWCU-V-1 would be modified and a larger operator installed, and that RCIC-V-8 and its associated operator would be replaced. Both modifications were to be completed at the R-9 refueling outage in the spring of 1994. Subsequent changes in our MOV Engineering Standards allow the Supply System to conform to the guidance of Generic Letter 89-10 (GL 89-10) by alternate methods. This letter updates our earlier response to Supplement 3 of GL 89-10 as contained in Reference 1.

Our engineering standard for MOV sizing and switch setting has been revised for valves used to mitigate a high energy line break (HELB). The revised standard relies on the torque switch bypass switch setting to ensure that the valve closes to the seat overlap position prior to enabling the torque switch. As a result, no hardware changes, beyond changes to the torque switch

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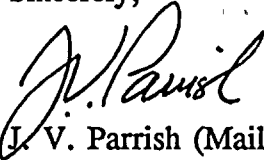
**SUPPLEMENTAL RESPONSE TO GENERIC LETTER 89-10,
SUPPLEMENT 3**

bypass, are required for RWCU-V-1. Upon approval of the pending Technical Specification change request (Reference 3) to increase the allowable stroke time, a gear change rather than a valve replacement will resolve the thrust concerns on RCIC-V-8. The torque switch bypass switch is already set to well beyond seat overlap at this time. RCIC-V-8 is operable in its current configuration and the gear change is being implemented to increase the thrust margin.

In Reference 1, the Supply System requested an extension for the WNP-2 implementation of its commitments to GL 89-10 until the end of the R10 refueling outage, currently scheduled to end in June 1995. In Reference 2, the NRC approved the extension request. However, the date granted in Reference 2 was April 1995, the beginning of the R10 outage. Because much of the testing must be performed during the outage, it is the Supply System's understanding that the April date was intended to be the end of R10. Therefore, the Supply System requests that the NRC acknowledge that the deadline is the end of the R10 refueling outage.

If you have any questions or desire additional information regarding this matter, please contact me or H. E. Kook at (509) 377-4278.

Sincerely,



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

MGE/bk

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N



STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Supplemental Response to Generic
Letter 89-10, Supplemental 3

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.

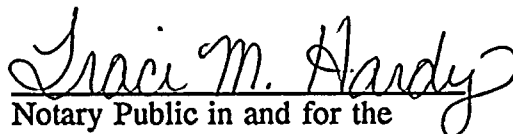
DATE 14 April, 1994


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 14th day of April 1994.




Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennelworth, WA

My Commission Expires 8/9/95

