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SUBJECT: Informs of mod to WNP-2 FSAR commitment per surveillance of post-irradiated fuel.

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Gentlemen:

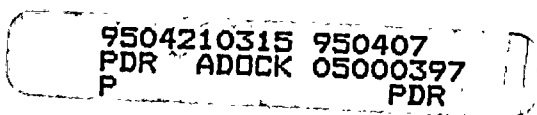
Subject: **WNP-2, OPERATING LICENSE NPF-21
MODIFICATION OF POST-IRRADIATION FUEL SURVEILLANCE
COMMITMENT**

References: 1) WPPSS Nuclear Project No. 2, Final Safety Analysis Report (FSAR),
 Section 4.2.4.3, "Post-Irradiation Surveillance"

 2) NUREG 0892, "WNP-2 Safety Evaluation Report," Section 4.2.4.3,
 "Postirradiation Surveillance"

The purpose of this letter is to inform you of a modification to a WNP-2 FSAR commitment pertaining to surveillance of post-irradiated fuel. As part of our routine fuel inspection program described in the WNP-2 FSAR (Reference 1), a visual examination is currently performed on five to ten percent of the highest burnup assemblies of the discharged fuel after each refueling. The visual examination is for the detection of indications of generic gross cladding defects or anomalies that may have occurred during operation. This commitment was accepted by the NRC in the WNP-2 Safety Evaluation Report (Reference 2), as adequately addressing the issue of post-irradiation surveillance.

As an alternate approach, the Supply System has evaluated post-irradiation fuel inspection activities and determined that it would be acceptable to perform visual inspection only on discharged fuel where there was indication of either actual or suspected gross cladding defects or anomalies. Examples of such indications include increased Offgas System activity and negative impacts on water chemistry parameters.



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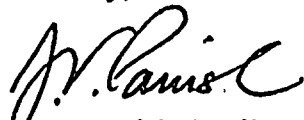
MODIFICATION OF POST-IRRADIATION FUEL SURVEILLANCE COMMITMENT

The evaluation of our commitment was performed by means of the 10 CFR 50.59 process and it was concluded that the change in the commitment would not result in an unreviewed safety question or a change to the WNP-2 Technical Specifications. There is sufficient industry and WNP-2 experience pertaining to examination of irradiated fuel through lead fuel assembly programs, lead test assembly programs and actual core reloads to provide an adequate level of confidence in the reliable performance of the WNP-2 fuel design. In addition, any failure of fuel cladding that could be seen by visual inspection would also be apparent by indicators during operations, and prior to removal and subsequent post-irradiation inspection. Modification of the commitment for post-irradiation visual inspection of discharged fuel, except when gross cladding defects or anomalies are suspected, would affect neither the reliable performance of the WNP-2 fuel design nor the probability of the loss of cladding integrity. Furthermore, the present random examination process results in an economic or radiological exposure burden with no commensurate improvement in safety.

Accordingly, current plans are to perform post-irradiation inspection only on discharged fuel with indication of either actual or suspected gross cladding defects or anomalies. The Supply System will incorporate this change to the post-irradiation surveillance program in the next annual amendment to the WNP-2 FSAR (currently scheduled for August 1995). This submittal is made for information only. Therefore, no staff action is requested.

Should you have any questions or desire additional information regarding this matter, please contact me or D. A. Swank at (509) 377-4563.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Vice-President, Nuclear Operations

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