

CATEGORY 1

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SUBJECT: Responds to NRC GL 96-01, "Testing of Safety-Related Logic Circuits."

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April 16, 1996

Docket No. 50-397

GO2-96-081

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D. C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21 RESPONSE TO GENERIC LETTER 96-01, "TESTING OF SAFETY-RELATED LOGIC CIRCUITS"**

- References:
- 1) NRC Generic Letter 96-01, dated January 10, 1996, "Testing Of Safety-Related Logic Circuits"
 - 2) NRC February 14, 1996 letter, B.A. Boger (NRC) to A. Marion (NEI), regarding NRC's agreement to extend the response date for Generic Letter 96-01

The Supply System hereby responds to the referenced generic letter and provides the requested information regarding implementation action(s) and completion schedule. The referenced generic letter recommends that the following actions be performed:

- "(1) Compare electrical schematic drawings and logic diagrams for the reactor protection system, EDG load shedding and sequencing, and actuation logic for the engineered safety features systems against plant surveillance test procedures to ensure that all portions of the logic circuitry, including the parallel logic, interlocks, bypasses and inhibit circuits, are adequately covered in the surveillance procedures to fulfill the TS requirements. This review should also include relay contacts, control switches, and other relevant electrical components within these systems, utilized in the logic circuits performing a safety function.
- (2) Modify the surveillance procedures as necessary for complete testing to comply with the technical specifications. Additionally, the licensee may request an amendment to the technical specifications if relief from certain testing requirements can be justified.

It is requested the completion of these actions be accomplished prior to startup from the first refueling outage commencing one year after the issuance of this generic letter."

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The referenced generic letter also required licensees to inform the staff within 60 days of the letter date as to whether or not the licensee would implement requested actions (1) and (2) of the generic letter. The generic letter response due date was subsequently changed to April 18, 1996, per reference 2, to allow NRC Staff and industry representatives to participate in a workshop to discuss and clarify the generic letter action requirements.

Background

In 1991 the Supply System implemented a five week Surveillance Procedure Verification Program to review Technical Specifications surveillance implementation. This was a limited scope review that compared Technical Specifications surveillance requirements with information obtained from the Scheduled Maintenance System (SMS) data base. The surveillance procedures were reviewed for purpose, but not content or methodology. This review identified a number of generic and specific concerns with the content of the surveillance procedures. As a result of this review, the Supply System initiated a Quality Action Team to investigate and determine the appropriate course of action to resolve the identified concerns.

The Quality Action Team recommended, in June 1992, specific corrective actions to improve the Technical Specifications surveillance program. In late 1992, the Supply System implemented the Technical Specifications Surveillance Improvement Program (TSSIP). The TSSIP performed an in-depth technical review of the surveillance procedures to ensure they met Technical Specifications surveillance requirements. The review criteria included proper test methodology, procedure consistency, technical accuracy, and reference bases for acceptance criteria. The goals of the TSSIP project were to assure:

1. That related procedures required to be performed to satisfy Technical Specifications surveillance requirements were referenced (listed) and explained in the Purpose section of the procedure;
2. That prerequisites and special conditions required to assure Technical Specifications compliance were stated in the procedure;
3. That procedure acceptance criteria satisfied the Technical Specifications surveillance requirements and acceptance criteria had reference bases;
4. That procedure steps associated with assuring Technical Specifications acceptance criteria were met and identified;
5. That numerical values, setpoints, tolerances, calculations, graphs, figures, and tables included or referenced in the procedure were consistent with values specified in Technical Specifications;

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6. That the procedure tested the entire channel, including sensor, indicators, alarms, and trip functions as applicable;
7. That the procedure performance frequency met Technical Specifications requirements; and
8. That the procedure satisfied the applicable Technical Specifications surveillance requirements and met the intent of the Technical Specifications Bases.

Because the adequacy of the surveillance program was suspect, TSSIP reviews were based on the actual Technical Specifications surveillance requirement. This assured no assumptions were made regarding the adequacy of existing surveillance implementing documents. The program resulted in the expenditure of greater than 12,000 man-hours and the generation of numerous review packages which in some cases documented various Technical Specifications non-compliance issues. The TSSIP reviews which resulted in the identification of Technical Specifications non-compliance issues were promptly reported to the NRC in accordance with the requirements of 10 CFR 50.72. Written notification of these non-compliance issues were reported to the NRC per the requirements of 10 CFR 50.73 in LER 93-010 and its eight supplements.

Response

Action (1) of the generic letter requests that surveillance procedures be verified to ensure that all portions of the logic circuit are tested to fulfill the Technical Specifications surveillance requirements. The Technical Specifications for WNP-2 define, in part, testing of logic systems to be "a test of all logic components, i.e., all relays and contacts, all trip units, solid state logic elements, etc, of a logic circuit, from sensor through and including the actuated device, to verify OPERABILITY." The Supply System used this Technical Specifications definition in evaluating Generic Letter 96-01.

This letter provides the Supply System response to the referenced generic letter and informs the staff that the reviews of Technical Specifications logic circuits against the plant surveillance procedures to ensure Technical Specifications compliance were completed as part of the TSSIP review process. The TSSIP program was developed as a result of concerns with the adequacy and scope of the Technical Specifications surveillance program and its implementing procedures. Throughout the TSSIP review period, issues and concerns were identified by the TSSIP reviewers, appropriate deficiency documents were issued and the required corrective actions initiated to achieve Technical Specifications compliance. The TSSIP review generated a package centered on specific Technical Specifications surveillance requirements. Packages included applicable Technical Specifications Bases, reference design materials such as electrical schematic drawings and logic diagrams, copies of documents used to address any deficiencies identified during the review process, and copies of the surveillance procedures credited with assuring compliance with the plant Technical Specifications.

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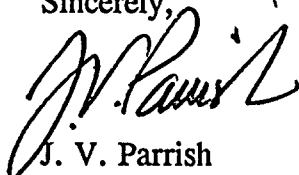
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To ensure continued Technical Specifications compliance and to maintain high quality surveillance implementing procedures, the Supply System has incorporated the TSSIP review criteria as part of the plant procedure change process. Proposed procedure changes are reviewed by technically competent reviewers to ensure that the procedure retains the required actions to meet the Technical Specifications surveillance requirements. Identified concerns are documented and if appropriate deficiency documents are initiated.

Based on past TSSIP reviews of the surveillance implementing procedures for Technical Specifications compliance and the on-going administrative processes to ensure Technical Specifications compliance, the Supply Systems believes that Technical Specifications testing requirements for the generic letter identified logic circuits have been and will continue to be complied with. No further specific action is planned in response to Generic Letter 96-01.

Should you have any questions or desire additional information regarding this matter, please call me or L.C. Fernandez at (509) 377-4147.

Sincerely,



J. V. Parrish
Chief Executive Officer
(Mail Drop 1023)

JMP

Attachments

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