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 PARRISH, J.V. Washington Public Power Supply System
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SUBJECT: Submits response to GL 94-02, Action 2, "Long-Term Solutions & Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

December 17, 1996
GO2-96-246

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
RESPONSE TO NRC GENERIC LETTER 94-02, ACTION NO. 2**

- References:
- 1) NRC Generic Letter 94-02, "Long-Term Solutions and Upgrade of Interim Operating Recommendations for Thermal-Hydraulic Instabilities in Boiling Water Reactors," dated July 11, 1994
 - 2) Letter, dated July 12, 1993, A. Thadani (NRC) to L.A. England (BWROG), "Acceptance for Referencing of Topical Reports NEDO-31960 and NEDO-31960, Supplement 1, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology"
 - 3) Letter, dated January 12, 1995, JV Parrish (SS) to NRC, "Response to NRC Generic Letter 94-02"
 - 4) Letter, dated August 29, 1994, JV Parrish (SS) to NRC, "Response to NRC Generic Letter 94-02"
 - 5) Letter, dated January 11, 1993, JV Parrish (SS) to NRC, "Response to Notice of Violation and Notice of Deviation - Power Oscillation Event"

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The NRC requirement for stability long-term corrective actions to ensure compliance with General Design Criteria 10 and 12 of 10 CFR 50 was originally presented in NRC Bulletin 88-07, Supplement 1 (December 30, 1988). The resulting BWR Owners' Group (BWROG) efforts in this area led to the solution concepts and supporting methodology described in NEDO-31960, "BWR Owners' Group Long-Term Stability Solutions Licensing Methodology" and NEDO-31960, Supplement 1. NRC acceptance of the BWROG-developed solution concepts and supporting methodology was indicated in Reference 2. Based on the NRC acceptance of these concepts and methodology, the Supply System elected in reference 3 to

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RESPONSE TO NRC GENERIC LETTER 94-02, ACTION NO. 2

proceed with the Enhanced Option 1-A concept described in NEDO- 32339 for the stability long-term solution. This option introduces new plant hardware and software to provide early detection of oscillations and to initiate an appropriate mitigating action. Reference 3 also provided a preliminary implementation schedule which was dependent upon GE hardware/software design development, delivery of the final product, and Supply System processing and implementation of the necessary plant design change packages.

Delays with GE hardware delivery, the availability of GE supporting design documents, and the need to assure a quality design change document have resulted in the Supply System being unable to complete the necessary design effort for the Enhanced Option 1-A stability solution to meet our outage milestone. As a result of the need to ensure the development of a quality design change document and the identified delays, it has become necessary to extend, by one year, the originally proposed schedule for installation of the Enhanced Option 1-A solution.

The following revised schedule is based on the best delivery dates for the Period Based Detection System (PBDS) and Flow Control Trip Reference (FCTR) cards and allows for sufficient time to ensure the development of a quality design document, ensuring a quality installation and implementation of the stability long-term solution. The revised schedule also includes the necessary time needed to accumulate operational experience before the long-term stability modification is fully implemented.

	<u>Original Schedule</u>	<u>Projected Schedule</u>
• Design change packages completed	June 30, 1996	June 30, 1997
• Installation of one PBDS and FCTR card	June 30, 1997	June 30, 1998
• Installation of remaining PBDS and FCTR cards	June 30, 1998	June 30, 1999
• Technical Specification Change submitted	March 31, 1997	December 31, 1997
• Full implementation (trip function armed)	June 30, 1998	June 30, 1999

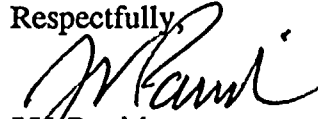
In response to previous core stability concerns and to assure safe plant operation, the Supply System strengthened the administrative controls intended to avoid power oscillations and to detect and suppress them if they occurred. The Supply System implemented power distribution controls, the use of a stability monitor, revised appropriate operating procedures, and performed operator training regarding core stability issues. These additional controls will be continued until the long-term core stability solution is fully implemented. As a result, the continued operation of the facility for an additional year under the present administrative controls ensures adequate protection of the public health and safety. Additional discussion of the WNP-2 interim compensatory actions is provided in references 4 and 5.

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

Respectfully,



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

JMP


cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
NRC Sr. Resident Inspector - 927N
TG Colburn - NRC
NS Reynolds - Winston & Strawn
DL Williams - BPA/399

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: NRC Generic Letter 94-02
Action No. 2

I, J. V. PARRISH, being duly sworn, subscribe to and say that I am the Chief Executive Officer 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.

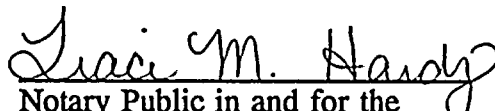
DATE 12/17, 1996



J. V. Parrish
Chief Executive Officer

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 17th day of December 1996.



Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 8/9/99

