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SUBJECT: Comments on final draft SE of proposed conversion to improved TS.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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January 31, 1997  
GO2-97-019

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
COMMENTS ON FINAL DRAFT SAFETY EVALUATION**

- References:
- 1) Letter dated January 9, 1997, TG Colburn (NRC) to JV Parrish (SS) "Final Draft Safety Evaluation of Proposed Improved Technical Specifications, Washington Public Power Supply System WNP-2"
  - 2) Letter, GO2-97-006, dated January 14, 1997, PR Bemis (SS) to NRC, "Request for Amendment to the Technical Specifications Additional Information"

In Reference 1, the staff provided the Supply System an opportunity to review the final draft safety evaluation (SE) of the proposed conversion to Improved Technical Specifications (ITS). The comments are listed, by page number, as an attachment to this letter. These comments are for those areas of the SE where clarification may be appropriate or where typographical errors could lead to confusion.

In Reference 2, the Supply System provided the staff a final copy of the proposed ITS. As discussed with TG Colburn, an additional change other than those noted in Reference 2 was made. In the preparation of the Figure 3.4.11-3 on page 3.4-30 for transfer to Word Perfect 5.1 format, a typographical error was corrected. A coordinate on the figure had been incorrectly labeled (148° F, 312 psig). This was changed to indicate the correct temperature of 140° F rather than 148° F. The correction of this error brings the figure into agreement with the current Technical Specification Figure 3.4.6.1B.

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**COMMENTS ON FINAL DRAFT SAFETY EVALUATION**

Should you have any questions or require additional information pertaining to this letter, please contact either me or Ms. L.C. Fernandez at (509) 377-4147.

Respectfully,



R.L. Webring  
Vice President, Operation Support/PIO  
Mail Drop PE08

Attachment: Technical Comments

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



TECHNICAL COMMENTS

PAGE NUMBER	PARAGRAPH NUMBER	ISSUE
13	5	12th definition should be ISOLATION SYSTEM
14	1	Reformatted definitions contains # 1.18. It should be # 1.16. Definition 1.18 is not in ITS 1.4
15	3	Definition 1.18 should be 1.16
18	2	The end of the paragraph should reference LCO 3.4.11
19	1	Nominal setpoints are not "specified in the LCS." As part of implementation the setpoints will be relocated to FSAR or LCS
20	1	States that requirements will be moved to QA Program. Submittal says FSAR or LCS
34	3	The 3rd sentence, "CTS 3.1.3.7, Action A.3 provides....," is incorrect and should be deleted.
35	4	The last sentence states that adding the words "following CORE ALTERATIONS" is acceptable. These words are not in SR 3.1.3.5. DOC says that "work" encompasses core alterations.
74	1	List of channel calibrations extended to 24 months does not include RWCU blow down flow. See Volume 5, Section 3.3.6.1, page 11 of 12, DOC LE.1
75	8	Replace the last sentence with, "regardless of other channel status."
77	4	This paragraph states that the licensee verifies the operability of instrumentation during in-house calibration surveillances. This is correct. It also states that setpoint calculation assumptions continues to be met during routine surveillances. The Supply System does not compare the results of routine surveillances to the setpoint calculations, but does verify operability.
95	4	Discussion of CTS 3.3.4.1 should refer to ITS SR 3.3.4.2.4 not 3.3.4.1.4.
123	4	3.3.1.2 is SRMs not control rod block.
125	5	Change from "containment" system to "instrumentation" system
129	2	Licensee "plans" to adopt staff allowance, rather than "adopted".
162	7	The change described in this paragraph was withdrawn.
206	4	The discussion is not technically accurate for WNP-2 analysis.
210	1,2	This paragraph should be labeled "3/4.7.3" and the paragraph should be moved to follow 3.7.7 discussion. The next paragraph is applicable to the section labeled "3.7.3" that starts on page 208. This is confusing because the second paragraph does not relate to RCIC and because the first paragraph is not applicable to any STS in section 3.7.





COMMENTS ON FINAL DRAFT SAFETY EVALUATION

Attachment

Page 2 of 2

TECHNICAL COMMENTS

PAGE NUMBER	PARAGRAPH NUMBER	ISSUE
212	5	Change SR 3.7.1.2 to 3.7.2.2
213	5	Applicable to CTS 4.7.2.e.2, not 4.7.2.3.2
220	5	The WNP-2 submittal did NOT evaluate the relocation of CTS 3/4.7.4, Snubbers against the "Final Policy Statement" or 10 CFR 50.36.
221	1	The justification for this relocation is discussed as a less restrictive change in Volume 6, section 3/4.7.4. The Supply System submittals for the conversion do not include an evaluation against the criteria discussed in this paragraph. The paragraph should be revised to make it clear that the evaluation against 50.36 was performed by the staff rather than the licensee.
243,	3	The 3rd sentence should be changed to "The 250 volt battery and charger provide power through a solid state inverter to various reactor core isolation cooling (RCIC), residual heat removal (RHR) and reactor water cleanup (RWCU) valves and to non-TS equipment such as plant controls, instrumentation, computer and communication equipment."  The 5th sentence should be changed near the end to "this change is acceptable because the specification for RCIC (ITS 3.5.3) and RCIC, RHR, and RWCU PCIVs (ITS 3.6.1.3) will ensure the appropriate actions are taken."
248	2	These same corrections should be made in the 2nd paragraph on page 248.
277	3	The conclusion states that none of the specifications met the four criteria. CTS 3.9.4 met criterion 2. (see SER page 276)

