

# CATEGORY 1

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ACCESSION: 9702210191      DOC. DATE: 97/02/10      NOTARIZED: NO      DOCKET #  
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SUBJECT: Comments on final DSER, including request to increase allowable start times for EDGs.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 10, 1997  
GO2-97-024

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, GO2-95-265, dated December 12, 1995, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specifications"
  - 2) Letter dated May 2, 1995, JW Clifford (NRC), to JV Parrish (SS), "Issuance of Amendment for the Washington Public Power Supply System Nuclear Project No. 2"

One of the changes requested in Reference 1 was an increase in the allowable start times for the emergency diesel generators (EDG). This change was based on the results of the accident analyses performed for power uprate as reviewed and approved by the staff in Reference 2. The five additional seconds starting time for each EDG was an assumption used in the analyses.

There are several conservative assumptions made in the accident analyses. Some of the assumptions are conservative when compared to actual plant equipment performance. For example: the EDGs start and load in less than 10 seconds; injection valve stroke times are less than 13 seconds; and flow to the core will begin before the injection valves are full open. The analyses assume 15 second EDG start and load times, valve stroke times from 19 to 28 seconds, and no flow to the core until the injection valves are full open.

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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 for*

R.L. Webring

Vice President, Operations Support/PIO

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