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 SWANK, D.A. Washington Public Power Supply System
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SUBJECT: Comment supporting proposed generic communications,
 "Effectiveness of Ultrasonic Testing Sys in ISI Program."

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61 FR 69120
Dec. 31, 1996



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

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February 25, 1997
GO2-97-037

Docket No. 50-397

Chief, Rules Review and Directives Branch
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Gentlemen:

Subject: **ULTRASONIC TESTING SYSTEMS IN INSERVICE INSPECTION PROGRAMS; NOTICE OF OPPORTUNITY FOR PUBLIC COMMENT**

- References:
- 1) Proposed Generic Communication; Effectiveness of Ultrasonic Testing Systems in Inservice Inspection Programs, (61 Fed. Reg. 69120 - December 31, 1996 and 62 Fed. Reg. 3064 - January 21, 1997)
 - 2) NEI Letter, David J. Modeen to Chief, Rules Review and Directives Branch, February 1997, same subject

In reference 2, NEI provided comments on the "Proposed Generic Communication; Effectiveness of Ultrasonic Testing Systems in Inservice Inspection Programs." The Supply System has reviewed the proposed generic communication and fully endorses the NEI position that the proposed generic communication:

1. Must have a backfit analysis per the requirements of 10 CFR 50.109(a)(3).
2. Would cause licensees to violate the ASME practices presently required by 10 CFR 50.55a.
3. Requests licensees to voluntarily commit to implementing a performance based program which is inconsistent with the proposed generic letter statement that "a safety concern does not exist that would warrant immediate backfitting of Appendix VIII in advance of the rulemaking that has been initiated."
4. Is not consistent with the Commission's "Principles of Good Regulation."
5. Places inordinate pressure on licensees to implement a program similar to Appendix VIII.

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ID ER-5 Generic Letter

THE
FEDERAL BUREAU OF INVESTIGATION
UNITED STATES DEPARTMENT OF JUSTICE
WASHINGTON, D. C. 20535

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**ULTRASONIC TESTING SYSTEMS IN INSERVICE INSPECTION PROGRAMS
NOTICE OF OPPORTUNITY FOR PUBLIC COMMENT**

Implementation of the present Appendix VIII provisions at WNP-2 will require many man-years of effort. The cost benefit has not been clearly established.

If you have any questions please contact me or Mr. Don Welch at (509) 377-2376 or e-mail address drwelch@wnp2.com.

Respectfully,



D.A. Swank
Manager, Regulatory Affairs
(Mail Drop PE20)

cc: Mr. K.O. Cozens, NEI
Mr. D.J. Modeen, NEI

SECRET

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