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SUBJECT: Submits info to be added to initial evaluation re TS response time testing.

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April 2, 1997
GO2-97-061

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 REQUEST FOR ADDITIONAL INFORMATION REGARDING RESPONSE TIME TESTING

Reference: Letter, GO2-97-057, PR Bemis (SS) to NRC "Request For Amendment, Under Exigent Circumstances, To Operating License Regarding Technical Specification Response Time Testing"

In a conference call with the staff on March 25, 1997, Mr TG Colburn requested additional information be submitted in support of the no significant hazards consideration submitted as Attachment 3 of the reference. The following provides the information to be added to the initial evaluation.

Operation of WNP-2 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment applies, in part, to the testing requirement for the components identified and does not result in any physical change to these or other components or their operation. The changes do not affect the capability of the associated systems to perform their intended function within the acceptable limits assumed in plant safety analyses and required for successful mitigation of an initiating event. The proposed amendment does not change the way in which any plant systems are operated or create the possibility of a new or different kind of accident. As a result, no new failure modes are introduced.

The proposed amendment also deletes the applicability of response time testing for ECCS systems during MODES 4 and 5. This change in testing requirements does not change the way in which any plant systems are operated or create the possibility of a new or different kind of accident. As a result, no new failure modes are introduced.

RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

The proposed amendment represents reliance on a different, and previously staff approved, method to verify selected components remain fully functional. It also requests a reduction in test requirements for ECCS in MODES 4 and 5. These changes will not create the possibility of a new or different kind of accident from any accident previously evaluated.

Operation of WNP-2 in accordance with the proposed amendment change will not involve a significant reduction in the margin of safety.

Deleting the requirement to verify response times for ECCS during MODES 4 and 5 will not affect the capability of the associated systems to perform their intended function within the allowed response time used as the basis for the plant safety analyses.

Plant and system response to an initiating event will remain in compliance with the assumptions of the safety analyses, and therefore the margin of safety is not affected.

Should you have any questions or desire additional information regarding this matter, please call me at (509) 377-4563.

Respectfully,

D.W. Coleman for

D.A. Swank
Manager, Regulatory Affairs
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