

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9704090311 DOC. DATE: 97/04/03 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH: NAME AUTHOR AFFILIATION
 SWANK, D.A. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Provides addl description of exigent circumstances for 970322 request for amend re TS response time testing.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 2
 TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD4-2 LA	1 1	PD4-2 PD	1 1
	COLBURN, T	1 1		
INTERNAL:	ACRS	1 1	<u>FILE CENTER 01</u>	1 1
	NRR/DE/ECGB/A	1 1	NRR/DE/EMCB	1 1
	NRR/DRCH/HICB	1 1	NRR/DSSA/SPLB	1 1
	NRR/DSSA/SRXB	1 1	NUDOCS-ABSTRACT	1 1
	OGC/HDS3	1 0		
EXTERNAL:	NOAC	1 1	NRC PDR	1 1

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE. TO HAVE YOUR NAME OR ORGANIZATION REMOVED FROM DISTRIBUTION LISTS
 OR REDUCE THE NUMBER OF COPIES RECEIVED BY YOU OR YOUR ORGANIZATION, CONTACT THE DOCUMENT CONTROL
 DESK (DCD) ON EXTENSION 415-2083

TOTAL NUMBER OF COPIES REQUIRED: LTTR 14 ENCL 2

C
A
T
E
G
O
R
Y

1

D
O
C
U
M
E
N
T



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 3, 1997
GO2-97-063

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 TIME TESTING, REQUEST FOR ADDITIONAL
INFORMATION**

- References:
- 1) Letter, GO2-97-057, dated March 22, 1997, PR Bemis (SS) to NRC, "Request For Amendment, Under Exigent Circumstances; To Operating License Regarding Technical Specification Response Time Testing"
 - 2) Letter, GI2-97-052, dated March 20, 1997, TP Gwynn (NRC) to JV Parrish (SS), "Response Time Measurement in Accordance With Technical Specification Requirements"
 - 3) Letter, GO2-97-056, dated March 20, 1997, JV Parrish (SS) to NRC, "Request For Enforcement Discretion To Technical Specification Response Time Testing Requirements"

The reference requested an amendment to the WNP-2 Technical Specifications, under exigent circumstances. The following provides additional description of the exigent circumstances in support of that request.

The staff indicated that the Supply System was in violation of Technical Specifications in Reference 2. Prior to that, the Supply System believed the surveillance testing requirements in Technical Specifications had been satisfied. The failure to satisfy the response time testing requirement was not formally identified by the staff until March 20. Consequently, it was not possible to submit this request on a more timely basis. The NRC staff stated in Reference 2 that the Supply System technical approach to verification of instrument operability is generally consistent with an approach the staff has found acceptable. Therefore, the Supply System concluded there was less risk in relying on the existing response time verification method than commencing a plant shutdown in order to gain actual test data in cold shutdown conditions.

10
AWI

9704090311 970403
PDR ADOCK 05000397
P PDR



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

MEMORANDUM

TO :

FROM :



Page 2

RESPONSE TIME TESTING, REQUEST FOR ADDITIONAL INFORMATION

Cold shutdown conditions would have been required to perform the response time testing to resolve the violation of the Technical Specifications. WNP-2 was placed in cold shutdown following the discretion requested in Reference 3. The Supply System continues to believe the methodology used to verify response times requested in this submittal is preferable to measuring of response times because personnel will absorb less dose and the plant will experience a higher availability of safety systems during the shutdown. Because the violation was only recently identified and the method currently used assures continued operability of the instrumentation, the Supply System is requesting this amendment under exigent circumstances.

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
Mail Drop PE20

cc: EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
TG Colburn - NRR
NRC Sr. Resident Inspector - 927N
DL Williams - BPA/399
PD Robinson - Winston & Strawn

