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SUBJECT: Provides addl info re GL 96-06, "Assurance of Equipment Operability & Containment Integrity During Design Basis Accident Condition."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM
P.O. Box 968 • Richland, Washington 99352-0968

May 29, 1997
GO2-97-110

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, ADDITIONAL INFORMATION REGARDING GENERIC LETTER 96-06, "ASSURANCE OF EQUIPMENT OPERABILITY AND CONTAINMENT INTEGRITY DURING DESIGN BASIS ACCIDENT CONDITIONS"**

References:
1) NRC Generic Letter 96-06, dated September 30, 1996, "Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions"

2) Letter GO2-97-015, dated January 28, 1997, JV Parrish (SS) to NRC, "Response to Generic Letter 96-06, Assurance of Equipment Operability and Containment Integrity During Design-Basis Accident Conditions"

In response to Reference 1, and as committed to in Reference 2, the Supply System hereby provides a summary of corrective actions and the implementation schedule necessary to ensure that piping systems are not exposed to the thermal overpressurization concerns identified in Reference 1.

As noted in Reference 2, the Supply System identified two systems that would be susceptible to thermal overpressurization during design basis accident (DBA) conditions. The first consists of a section of process sample line that was determined to be susceptible due to the containment penetration and associated containment isolation valves being isolated by closed manual isolation valves. The line required isolation due to leaking containment isolation valves. The associated containment isolation valves are scheduled for replacement during the current refueling outage. Following their replacement, the thermal overpressurization concerns noted in Reference 1 will no longer be applicable to this penetration.

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ADDITIONAL INFORMATION REGARDING GENERIC LETTER 96-06, "ASSURANCE OF EQUIPMENT OPERABILITY AND CONTAINMENT INTEGRITY DURING DESIGN BASIS ACCIDENT CONDITIONS"

The second system susceptible to thermal overpressurization during a DBA is the Reactor Closed Cooling Water (RCC) System. The area of concern is the containment penetration for the ten inch diameter RCC return line from containment and the associated containment isolation valves. This line automatically isolates during a design basis loss of coolant accident. With the exception of the containment isolation valves, the RCC System is not credited for mitigating any DBAs. As noted in Reference 2, and based on the incorporation of measured boundary leakage, it has been determined that containment integrity for this containment penetration is not compromised because the piping and the containment isolation valves will not be subjected to stresses in excess of ASME Code faulted allowable limits during a DBA.

In order to address the potential for the thermal overpressurization in the RCC System the Supply System intends to implement a design modification during the upcoming 1998 refueling outage. The modification, though subject to change based on additional engineering review, will involve the installation of a pressure relief path around the inboard containment isolation valve. This path would relieve pressure into the RCC System piping inside containment. That piping, in turn, is protected by an ASME Section VIII relief valve.

The Supply System is continuing to work with other industry groups such as the Boiling Water Reactor Owners' Group, the Nuclear Energy Institute, and the Electric Power Research Institute to develop long-term corrective actions necessary to ensure the important issues noted by Reference 1 are addressed appropriately. The Supply System will notify the staff should these or other industry efforts result in an acceptable methodology to address Reference 1 concerns other than physical modification to the RCC containment penetration.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. P. J. Inserra (509) 377-4147.

Respectfully,

J. V. Parrish
Chief Executive Officer
Mail Drop 1023

cc: EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
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PD Robinson - Winston & Strawn

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Additional Information Regarding Generic Letter 96-06 - "Assurance of Equipment Operability and Containment Integrity During Design Basis Accident Conditions"

I, J. E. WYRICK, being duly sworn, subscribe to and say that I am the Acting, Chief Executive Officer for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE May 29, 1997

J. E. Wyrick
J. E. Wyrick
Acting, Chief Executive Officer

On this date personally appeared before me J. E. WYRICK, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 29th day of May 1997.

Lori A. Mix
Notary Public in and for the
STATE OF WASHINGTON

Residing at N. Richland

My Commission Expires 3-29-2001