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SUBJECT: Provides addendum to NRC response to Unresolved Items 96-201-02 & 96-201-10 contained in Insp Rept 50-397/96-201. Util response modified as follows to reflect revised position on ADS design compliance w/Reg Guide 1.62.

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Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21**
INSPECTION REPORT 96-201
ADDENDUM: RESPONSE TO OPEN ITEMS

Reference: Letter, dated June 16, 1997, PR Bemis (SS) to NRC, "Inspection Report 96-201 Response to Open Items"

This letter provides an addendum to our response to Unresolved Items 96-201-02 and 96-201-10 contained in Inspection Report 96-201. Our response is modified as follows to reflect our revised position on Automatic Depressurization System (ADS) design compliance with Regulatory Guide 1.62, "Manual Initiation of Protective Actions," October 1973 and IEEE Standard 279-1971, "Criteria for Nuclear Power Plant Protection Systems," Section 4.17, "Manual Initiation." The regulatory guide describes a method acceptable for complying with the IEEE standard requirement that protection systems include means for manual initiation of each protective action at the system level, and that the single-failure criterion prescribed in the standard is met.

In the reference, we stated that a design change would be implemented to add seal-in circuits to the ADS logic such that, when ADS was manually initiated in either automatic or inhibit modes, the system function would go to completion. This change was to be implemented during the next refueling outage (Spring 1998).

Following further evaluation, we have concluded that the WNP-2 installed logic configuration assures that the ADS protective action goes to completion for both automatic or system level manual initiation in conformance with the commitment to Regulatory Guide 1.62 and IEEE Standard 279-1971. The current WNP-2 design also properly complies with the Three Mile Island (TMI), Anticipated Transient Without Scram (ATWS) and Emergency Operating Procedure (EOP) requirements to inhibit the ADS function (both automatic and system level manual initiation logics) upon entry into the EOPs.

The use of the ADS inhibit switch is guided by the Emergency Procedure Guidelines (EPGs) and the EOPs. Operators are trained to actuate the inhibit switch immediately upon entry into the EOPs from a reactor vessel low water condition (Level-3: +13 inches) to prevent premature reactor pressure vessel depressurization. Although the manual initiation logic is intended as a backup for automatic initiation, both logic train modes are inhibited in accordance with the EOPs until such time that operators elect to return the ADS inhibit switch to the automatic position. However, when reactor pressure vessel depressurization is required, it is accomplished using individual safety/relief valve control switches instead of the system level manual initiation switches.

As noted in the inspection report, the General Electric functional control diagram, which has been incorporated into the FSAR, does not agree with the installed configuration of the manual initiation of the ADS. However, this inconsistency between the FSAR functional control diagram and the installed field wiring does not affect ADS system compliance with Regulatory Guide 1.62, TMI, ATWS and EPG/EOP requirements. The lack of seal-in capability for the manual initiation logic, when the system is inhibited, also does not impact system safety function.

The discrepancy between the FSAR functional control diagram and the installed logic configuration will be corrected. A drawing revision is in process to correct the diagram to match that of the actual field-installed configuration. This will be completed commensurate with the ongoing FSAR upgrade effort. The FSAR upgrade effort is scheduled to be completed by December 1998.

If you have any questions or require additional information pertaining to this letter, please contact P.J. Inserra at (509) 377-4147.

Respectfully,

P.R. Bemis
Vice President, Nuclear Operations
Mail Drop PE23

cc: EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
TG Colburn - NRR
NRC Senior Resident Inspector - 927N
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