

# CATEGORY 1

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AUTH. NAME      AUTHOR AFFILIATION  
SMITH, G.O.      Washington Public Power Supply System  
RECIP. NAME      RECIPIENT AFFILIATION

SUBJECT: Requests exemption to requirement in 10CFR55.59(a)(2) re annual operating test requirements. One-time exemption from requirement to period not to exceed 15-months from last date of passing operating exam for licensee at facility.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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May 7, 1999  
GO2-99-088

Docket No. 50-397

Director of Nuclear Reactor Regulation  
US Nuclear Regulatory Commission  
Washington, D.C. 20555

Gentlemen:

Subject:       **WNP-2 OPERATING LICENSE NPF-21  
REQUEST FOR ONE-TIME EXEMPTION TO THE ANNUAL  
OPERATING TEST REQUIREMENTS OF 10CFR55.59**

In accordance with the provisions of 10CFR55.11, "Specific Exemptions," the Washington Public Power Supply System (Supply System) is requesting an exemption to the requirement in 10CFR55.59(a)(2) which states that each licensee shall: "Pass a comprehensive requalification written examination and an annual operating test." Specifically, the Supply System is requesting that the annual operating test periodicity be allowed a one-time exemption from the "annual" requirement to a period not to exceed 15-months from the last date of passing the operating examination for each licensee at our facility. The Requalification Program 24-month cycle duration in 10CFR55.59(a)(1) will not be altered by this exemption request.

WNP-2 is presently transitioning from a 12-month to a 24-month refuel cycle. As part of this transition, the Spring 1999 Refueling Outage (RF14) has been moved to the Fall 1999 timeframe (currently scheduled for September 18 through October 23, 1999). To maximize the economic use of the current reactor fuel, WNP-2 is presently shut down for a 63 day Fuel Savings Dispatch (FSD) which began April 17, 1999. As such, two (2) outages are planned for calendar year 1999. Since an examination cycle requires approximately six (6) weeks to complete, there is not enough time following RF14 to provide a training cycle prior to the annual operating test. A one-time exemption of the annual operating test periodicity will allow for the WNP-2 Operations and Training staff to focus on outage activities while eliminating the need to conduct this requalification examination on overtime.

The Supply System has concluded that the requested exemption is authorized by law and will not endanger life or property and is otherwise in the public interest as provided for in 10CFR55.11. We respectfully request expeditious review of this exemption request in view of the benefits derived from not requiring the operators to conduct the annual requalification examination on overtime.

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Additional information has been attached to this letter to complete the Supply System's exemption request. Attachment 1 provides the background and justification for granting the proposed exemption. Attachment 2 describes an evaluation of the proposed exemption in accordance with 10CFR50.92(c) and concludes it does not result in a significant hazards consideration.

Should you have any questions or desire additional information, please call me or WD Shaeffer, Manager, WNP-2 Nuclear Training, at (509) 377-8266.

Respectfully,



GO Smith  
Vice President, Generation  
Mail Drop 927M

Attachments:

1. WNP-2 Justification For Exemption From 10CFR55.59(a)(2)
2. Evaluation of Significant Hazards Considerations

cc: EW Merschoff, - NRC RIV  
RM Gallo, - NRR  
JS Cushing, - NRR  
JL Pellet, - NRC RIV  
NRC Sr. Resident Inspector, - 927N  
DL Williams, - BPA/1399  
PD Robinson, - Winston & Strawn  
NRC Document Control Desk

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**WNP-2 JUSTIFICATION FOR EXEMPTION FROM 10CFR55.59(a)(2)**

**BACKGROUND**

WNP-2 is transitioning from a 12-month to a 24-month refuel cycle. As part of this transition, the Spring 1999 Refueling Outage (RF14) has been moved to the Fall 1999 timeframe (currently scheduled for September 18 through October 23, 1999). To maximize the economic use of the current reactor fuel, WNP-2 is presently shut down for a 63 day Fuel Savings Dispatch (FSD) which began April 17, 1999. As such, two (2) outages are planned for calendar year 1999, one of which is in the Fall, during the time that licensed operators would normally be provided with a full training cycle prior to their annual operating exam. Since an examination cycle requires approximately six (6) weeks to complete, there is not enough time following RF14 to provide a licensed operator requalification training cycle prior to the 1999 annual operating test.

This year's unique 24-month fuel cycle transition plan dictates having two (2) extended shutdown periods. A one-time exemption of the annual operating test periodicity will allow for the WNP-2 Operations and Training staff to focus on outage activities (clearance order processing and work control functions) while eliminating the need to conduct this requalification examination on overtime.

This one time exemption request is for a period not to exceed 15-months and is based on the date of the first examinations administered in 1998 (November 19, 1998) to the projected last day for administering the operating exam (February 11, 2000). Since examinations are administered over a period of six weeks (one week per operating crew), the actual period between operating exams will be less than 15-months for most licensed operators.

**JUSTIFICATION FOR GRANTING THE EXEMPTION**

NRC regulations provide for specific exemptions in 10CFR55.11. Under Section 55.11, the Commission is authorized to grant an exemption upon demonstration that the exemption is authorized by law; will not endanger life or property, and is in the public interest. The following justification addresses each of these 10CFR55.11 requirements:

**1. The Exemption Is Authorized By Law**

Section 55.11 allows licensees to apply for an exemption from requirements contained in Part 55 and the Commission's authority to grant exemptions from the requirements of Part 55 is codified in 10CFR55.11. Therefore, such exemption requests are explicitly authorized under NRC regulations.

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2. The Exemption Will Not Endanger Life Or Property

An exemption request will not endanger life if it can be shown that the request adequately protects the health and safety of the public. 10CFR55.59(a)(1) requires that each licensee: "Successfully complete a requalification program developed by the facility licensee that has been approved by the Commission. This program shall be conducted for a continuous period not to exceed 24-months in duration." The overall Requalification Program 24-month cycle duration in 10CFR55.59(a)(1) will not be altered by this exemption request. Further, the Requalification Program content required by 10CFR55.59(c) remains unchanged. Since the Requalification Program will continue to provide the same level and detail of training for licensed operators within the required 24-month duration, the licensed operators' ability to operate WNP-2 safely and protect the health and safety of the public has not been altered. Thus, granting this exemption will not endanger life or property.

3. The Exemption Request Is In The Public Interest

This year's unique 24-month fuel cycle transition plan dictates having two (2) extended shutdown periods. A one-time exemption of the annual operating test periodicity will allow for the WNP-2 Operations and Training staff to focus on outage activities (clearance order processing and work control functions) while eliminating the need to conduct this requalification examination on overtime. Thus, approval of this exemption request will enable a more effective application of resources to achieve safe and affordable power generation and thus is in the public interest.

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**Evaluation of Significant Hazards Considerations**

**Summary of Proposed Change:**

The Supply System is requesting an exemption to the requirement in 10CFR55.59(a)(2) which states that each licensee shall: "Pass a comprehensive requalification written examination and an annual operating test." Specifically, the Supply System is requesting that the annual operating test periodicity be allowed a one-time exemption from the "annual" requirement to a period not to exceed 15-months from the last date of passing the operating examination for each licensee at our facility. The Requalification Program 24-month cycle duration in 10CFR55.59(a)(1) will not be altered by this exemption request.

**No Significant Hazards Determination:**

Washington Public Power Supply System has evaluated the proposed exemption request using the criteria established in 10CFR50.92(c) and has determined that it does not represent a significant hazards consideration as described below.

The operation of WNP-2 in accordance with the proposed exemption will not involve a significant increase in the probability or consequences of an accident previously evaluated.

The probability of an evaluated accident is derived from the probabilities of the individual precursors to that accident. The consequences of an evaluated accident are determined by the operability of plant systems and the ability of plant personnel to mitigate those consequences.

Requalification Program requirements have been established at WNP-2 consistent with 10CFR55.59 and industry standards to ensure that operator performance during normal, transient, and accident conditions is acceptable. The proposed exemption does not alter the overall Requalification Program 24-month cycle duration in 10CFR55.59(a)(1). Further, the Requalification Program content required by 10CFR55.59(c) remains unchanged. Since the Requalification Program will provide the same level and detail of training within the required 24-month cycle, the licensed operators' ability to safely operate WNP-2 and protect the health and safety of the public has not been altered. There is no potential for an increase in personnel errors that might be accident precursors. Since there is no increase in individual precursors of an accident, the probability of an evaluated accident is not increased.

The purpose of requalification training is to establish and maintain programs that produce well qualified, competent licensed personnel to operate the plant systems and components in a safe and reliable manner such that these systems perform as designed. At WNP-2, performance standards and expectations have been established and defined by accreditation objectives and criteria consistent with those provided by the National Academy for Nuclear Training. The objectives address functional areas consistent with 10CFR55.59. Industry recognized objectives and criteria provide the basis for self-evaluation of the WNP-2 Requalification Program. These objectives and criteria describe the expected results of an effective, well-managed training program. Using the National Academy for Nuclear Training methodology, the WNP-2 Requalification Program produces well-qualified, competent licensed personnel to



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operate plant systems. Since the licensed operators' ability to effectively manage plant systems designed to mitigate accident consequences has not changed, the consequences of an accident previously evaluated are not expected to increase.

**The operation of WNP-2 in accordance with the proposed exemption will not create the possibility of a new or different kind of accident from any accident previously evaluated:**

Creation of the possibility of a new or different kind of accident would require the creation of one or more new precursors of that accident. New accident precursors may be created by modifications of the plant configuration, including changes in allowable modes of operation or the potential for new or different personnel errors. This exemption request does not involve any modifications of the plant configuration or allowable modes of operation. The proposed exemption does not alter the overall Requalification Program 24-month cycle duration in 10CFR55.59(a)(1) and the Requalification Program content required by 10CFR55.59(c) remains unchanged. Since the Requalification Program will provide the same level and detail of training for the required 24-month cycle, the licensed operators' ability to safely operate WNP-2 and protect the health and safety of the public has not been altered. No potential exists for the creation of new personnel errors that might be new accident precursors. Since no new precursors of an accident are created, the possibility of a new or different kind of accident is not created.

**The operation of WNP-2 in accordance with the proposed exemption will not involve a significant reduction in the margin of safety for the following reasons:**

The Supply System's request that the annual operating test periodicity be allowed a one-time exemption from the "annual" requirement to a period not to exceed 15-months will not impact operator qualifications. The Requalification Program 24-month cycle duration in 10CFR55.59(a)(1) will not be altered by this exemption request and the Requalification Program content required by 10CFR55.59(c) remains unchanged. The Requalification Program will continue to produce well-qualified, competent licensed personnel. Thus, there is not a significant reduction in the margin of safety.

