**Washington Public Power Supply System**

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Docket No. 50-460
April 15, 1983
G01-83-0149

Director of Nuclear Reactor Regulation
Attention: Elinor G. Adensam, Chief
Licensing Branch No. 4
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

Subject: NUCLEAR PROJECT NO. 1
RESPONSE TO NUREG-0737, SUPPLEMENT 1

Reference:
1) Letter, Darrell G. Eisenhut, NRC to Licensees, Applicants and Holders of Construction Permits, Generic Letter No. 82-33, dated December 17, 1982.
2) Letter, G. D. Bouchey, Supply System to Harold R. Denton, NRC, "Construction Permit Extension WNP-1,"dated January 11, 1983.

Reference 1 requested that by April 15, 1983 we indicate our plan and schedule for implementation of NUREG-0737, Supplement 1 on WNP-1. The attachment to this letter provides the requested information. In some places we have provided schedule information relative to fuel load. For planning purposes the NRC should use the earliest date for construction completion of June 1, 1988 provided in reference 2 as the earliest fuel load date. With this schedule we expect to have our implementation of Supplement 1 completed by fuel load, thus negating a phased approach.

G. D. Bouchey, Manager
Nuclear Safety & Regulatory Program

GDB:AGH:cmo

Attachment

cc: D. G. Eisenhut, NRC
M. C. Thadani, NRC
N. S. Reynolds - D&L
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AH Lazar - B&W
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Add: W Paulson

# SAFETY PARAMETER DISPLAY SYSTEM (SPDS)

## PLAN

In FSAR Subsections 1.10.4 and 7.8.5 we discuss the safety parameter display system (SPDS). FSAR Table 7.8-4 lists the SPDS minimum parameter set. We have not provided the safety analysis discussed in NUREG-0737, Supplement 1.

Verification of the SPDS parameter set will take place during development of the Abnormal Transient Operation Guidelines (ATOG), Emergency Operating Procedures (EOP) validation, the human factors review of the SPDS and simulator usage[1]. The SPDS will be fully simulated on the WNP-1 simulator.

As discussed in FSAR Subsection 7.8.5, the WNP-1 SPDS system will be computer based with CRT display. Included in the computer input is the Regulatory Guide 1.97 parameter list[2]. With this flexibility, any need to change the SPDS parameter set that might be identified during the above mentioned reviews can be readily accomodated.

Given the WNP-1 schedule we would expect NRC evaluation of the SPDS, control room review and EOPs to all be completed prior to fuel load and therefore the questions of their priorities, the need to change technical specifications and the potential for unresolved safety issues, mentioned in Supplement 1 would be moot.

## SCHEDULE

We will submit additional information on the SPDS design three years prior to fuel load. We will submit our results of the SPDS parameter set verification two years prior to fuel load.

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1. The human factors review of the SPDS could not be performed during the control room review discussed on the following page because the SPDS had not been defined.

2. Position indication for Containment isolation valves and the output from some radiation monitors will not be included in the SPDS.

# DETAILED CONTROL ROOM DESIGN REVIEW

## PLAN

In FSAR Subsection 1.10.1, in response to NUREG-0737, Item I.D.1 we discuss the status of the WNP-1 control room design review. In summary, we met with the staff on April 14, 1981 and presented our proposed plan to respond to NUREG-0737, Item I.D.1. At that meeting the staff stated that if the Supply System took the steps outlined in the meeting, it appeared it would be an acceptable approach to addressing Item I.D.1.

Subsequent to this meeting we performed the control room review as outlined to the staff and submitted the results of the review to the NRC on May 27, 1982.[3]

While NUREG-0737, Item I.D.1 indicated that additional NRC guidance on the performance of control room design reviews would be forthcoming (February 1981 was mentioned for NUREG-0700, but, infact, it wasn't issued until September 1981) the schedule for the release of the WNP-1 control room panel design for manufacture did not allow us to wait for the issuance of additional guidance. Thus, as discussed in our April 14, 1981 meeting, the WNP-1 review was based upon NUREG-0660, NUREG-0737 and NUREG/CR-1580.

The Supply System has also participated in a Control Room Task Analysis effort with the NRC Division of Facility Operations and its contractor, General Physics. This effort involved four event scenarios using the WNP-1 simulator.

Work remaining on NUREG-0737, Item I.D.1 is to 1) address the relationship between our May 27, 1982 submittal and the guidance promulgated in NUREG-0700 and 2) resolve the outstanding items listed in Section 4 of our May 27, submittal.

## SCHEDULE

As discussed above our response to NUREG-0737, Item I.D.1 was submitted to the NRC on May 27, 1982. We will initiate activities to resolve the above discussed outstanding items three years prior to fuel load and will complete the control room design review one year prior to fuel load with the exception that some environment aspects, such as background noise, can only be completed when the plant is operational.

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3. "Preliminary Control Room Assessment of the Washington Public Power Supply System's Supply System Nuclear Projects 1 and 4," BAW-1704, dated April 1982, submitted May 27, 1982.

## REGULATORY GUIDE 1.97 - APPLICATION TO EMERGENCY RESPONSE FACILITIES

### PLAN

Compliance to Regulatory Guide 1.97, Revision 2 is discussed in FSAR Subsection 7.4.2.10. Table 7.5-4 indicates the type of display and the location of the display within the control room for each measurement and indication. Included in this table (currently on sheet 32) are the meteorological variables displayed. Section 11.4 of the Emergency Plan discusses the meteorological monitoring, including contact with the National Weather Service.

In FSAR Subsection 7.8.5.2 it is stated that the Regulatory Guide 1.97, Revision 2 variables can be called up in the Technical Support Center via CRT terminal and in Subsection 7.8.5.6 it is stated that this same capability is available in the EOF[2].

Table 7.5-4 indicates the instrument range, redundancy, sensor location, display location within the control room and instrument power supply (latter is under "remarks"). Additional information on instrument power supply and information on environmental and seismic qualification and quality assurance is provided in Subsection 7.5.2.10, in response to the appropriate Regulatory Guide 1.97 Regulatory Position.

### SCHEDULE

The information required by NUREG-0737, Supplement 1 is included in the above mentioned FSAR material. No additional submittals are planned.

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2. Footnote 2 is on page 1 of this attachment.

## EMERGENCY RESPONSE FACILITES

### PLAN

The emergency response facilities are discussed in the WNP-1, 2 & 4 Emergency Plan,[4] FSAR Subsection 1.10.4 and other FSAR sections referenced in Subsection 1.10.4. In addition, the Supply System has submitted an evaluation of the EOF against NUREG-0696[5].

NUREG-0737, Supplement No. 1 states that in many cases there is a lack of detail in the material submitted for NRC review. We have reviewed our submittals and believe the FSAR and Emergency Plan provide adequate detail on the Technical Support Center, Operational Support Center (Operations Support Center in the Emergency Plan) and the Emergency Operations Facility.

### SCHEDULE

We believe the required information has been submitted to the NRC.

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4. "Washington Public Power Supply System Emergency Preparedness Plan," Revision 2, dated December 1981.

5. Letter, GD Bouchey, Supply System to A. Schwencer, NRC, "Nuclear Project No. 2, Description of Supply System Emergency Response Facilities," dated June 17, 1982.

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## UPGRADED EMERGENCY OPERATING PROCEDURES (EOPs)

### PLAN

In FSAR Subsection 1.10.1, in response to NUREG-0737, Item I.C.1, we discuss our plans for the development of the emergency operating procedures (EOPs). In summary, we are participating in a joint Supply System/TVA effort to develop Abnormal Transient Operating Guidelines (ATOG) for the B&W 205 FA design. However, as is the case for the 177 FA B&W plants, we had planned on plant specific guidelines. We are aware of the staff's desire for generic guidelines and we will follow this issue with the 177 FA plants.

During the development of the 205 FA guidelines, we have followed closely the NRC review of the Oconee and ANO-1 guidelines so as to factor into our procedures the resolution of any NRC concerns with these guidelines. We will also review the ATOG Safety Evaluation Report and the forthcoming development of the ATOG based EOPs for the 177 FA plants.

### SCHEDULE

Because of the previous review the NRC has given the ATOG procedures submitted by other B&W plant owners, and because of the plant specific approach currently used in development of the ATOG procedures, we propose to bypass the submittal of Technical Guidelines.

We will submit the procedures generation package, including WNP-1 specific ATOG, a writers guide, a description of the EOP validation program and a description of the training program for the ATOG based EOPs two years prior to fuel load.

Of course, with the WNP-1 schedule, the intital EOP procedures and training will be based upon ATOG (i.e., there is no meaning to "upgraded" for WNP-1).