



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

MAY 03 1985

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GI1-85-0060

GI3-85-159

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Docket Nos.: 50-460
and 50-508

RECEIVED

MAY 07 1985

G. C. SORENSEN

Mr. D. W. Mazur, Managing Director
Washington Public Power Supply System
Post Office Box 968
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Mazur:

Subject: NRC Comments on Future Licensability of WNP-1 and WNP-3

In response to your letter dated February 15, 1985, our comments are as follows:

- 1) If the Supply System maintains equipment and structures in accordance with the QA Program and the Preservation Program, we do not believe that the delay period will have an adverse effect upon plant licensability.
- 2) We are not aware of any future regulatory changes that will likely seriously challenge the licensability of those plants prior to their completion in the early 1990's.

Currently, the licensability of the subject units has been maintained in accordance with NRC regulations through the implementation of an NRC Region V reviewed and approved QA Program and the present short term Preservation Program for maintenance of equipment and structures. It is our understanding that the Supply System is now in the process of reviewing these programs for long term maintenance needs and plans periodic evaluations of the preservation program to assure that it is or is modified to remain effective in assuring licensability of the units. We understand that records will continue to be maintained, adverse offsite environmental impacts avoided, and reporting requirements such as 10 CFR 50.55(e) will be continued during the period of construction suspension. The NRC will continue its present practice of conducting periodic audits of the Supply Systems' implementation of the QA and preservation programs during the suspension. If such programs are effectively implemented, we believe the long term potential licensability of the units in terms of preserving structures, equipment and records can be maintained.

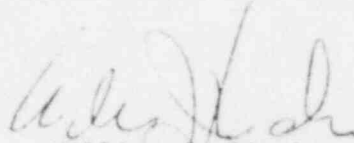
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During the period of construction suspension, the Commission will at times find that operating experiences and other developments may require additional requirements be placed on licensees in order that the design, construction and operation will assure the public health and safety. In view of the number of plants that have been postponed during construction, the staff will consider the legal and technical ramifications should a utility desire to reactivate a project after construction and licensing has stopped. Procedures for such projects should be developed by the end of 1985.

While there are a number of generic issues under review by the NRC, we should emphasize that all proposed generic requirements are required to be reviewed by the Committee to Review Generic Requirements prior to issuance to ensure they are warranted. Although regulations tend to change with time, we should also emphasize that the NRC has recently strengthened internal procedures that should ensure any plant specific backfits are limited to only those that can be clearly justified.

I trust that this response will prove helpful in your assessing the future licensability of Units 1 and 3.

Sincerely,

A handwritten signature in dark ink, appearing to read 'W. J. Dircks', is written over a horizontal line.

William J. Dircks
Executive Director for Operations



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Mr. V. Stello
Acting Executive Director for Operations
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