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AUG 29 1980

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Docket No.: 50-397

Washington Public Power Supply System
ATTN: Mr. Neil O. Strand
Managing Director
3000 George Washington Way
P. O. Box 968
Richland, Washington 99352

Dear Mr. Strand:

SUBJECT: INTERIM ACTIONS NEEDED FOR PLANT OPERATION PENDING FINAL RESOLUTION OF ANTICIPATED TRANSIENT WITH FAILURE TO SCRAM (ATWS) (GENERAL ELECTRIC BWR)

In December 1978, the Nuclear Regulatory Commission (NRC) staff issued Volume 3 of NUREG-0460 which describes the proposed type of plant modifications the staff believes are necessary to reduce the risk from anticipated transients with failure to scram (ATWS) to an acceptable level. The NRC's Regulatory Requirements Review Committee completed its review in January 1979, and concurred with the staff's approach described in Volume 3 of NUREG-0460 insofar as it applies to your plant. The staff has issued requests for the industry to supply generic analyses to confirm the ATWS mitigation capability described in Volume 3 of NUREG-0460. Subsequently, the staff plans to present its recommendations for rulemaking on ATWS to the Commission. The Commission would, by rulemaking, determine the required modifications to resolve ATWS concerns and the required schedule for the implementation of such modifications. Your plant would of course, be subject to the Commission's decision in this matter.

Based on considerations described in pages 42 through 45, Volume 3 of NUREG-0460, the staff generally concluded that plants with operating licenses can continue to operate without undue risk to the health and safety of the public during the estimated 2 to 5 year period needed to implement the necessary modifications.

However, in addition to our licensing requirement for a recirculation pump trip to mitigate the short-term consequences of ATWS events, the staff believes the following steps should be taken as a prudent course prior to the issuance of an operating license in order to further reduce the risk from ATWS events during the interim period before the required plant modifications as determined by the Commission are completed.

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1. An emergency operating procedure should be developed for an ATWS event, including consideration of scram indicators, rod position indicators, average power range flux monitors, (APRM), reactor vessel level and pressure indicators, relief valve and isolation valve indicators, and containment temperature, pressure and radiation indicators. The emergency operating procedure should be sufficiently simple and unambiguous to permit prompt operator recognition of an ATWS event.

2. The emergency operating procedure should describe actions to be taken in the event of an ATWS including consideration of manually scramming the reactor by using the manual scram buttons followed by changing the operation mode switch to the shutdown position, stripping the feeder breakers on the reactor protection system power distribution buses, scramming individual control rods from the back of the control room panel, tripping breakers from plant auxiliary power source feeding the reactor protection system, and valving out and bleeding off instrument air to scram solenoid valves. These actions must be taken immediately after detection of an ATWS event. Actions should also include prompt initiation of the residual heat removal system in the suppression pool cooling mode to reduce the severity of the containment conditions; and actuation of the standby liquid control system if a scram cannot be made to occur.

Early operator action as described above, in conjunction with a recirculation pump trip, would provide significant protection for some ATWS events, namely those which occur (1) as a result of common mode failure in the electrical portion of the scram system and some portions of the drive system, and (2) at low power levels where the existing standby liquid control system capability is sufficient to limit the pool temperature rise to an acceptable level.

We require that you submit your ATWS emergency operating procedure for our review. Our review may include a visit to your plant to determine the feasibility of implementing your proposed procedures through operator simulation of the steps. Our evaluation must conclude that an acceptable procedure and operator training are completed prior to the issuance of a full power operating license.

Sincerely,

Original signed by
Robert L. Tedesoo

Robert L. Tedesco, Assistant Director
for Licensing
Division of Licensing

cc: See next page

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