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 SCHWENCER, A. Licensing Branch 2

SUBJECT: Forwards procedure ^{see not} that ensure operability of ESF sys following removal from svc per NUREG-0737, Items II.K.1.10 & II.K.1.5. Confirmatory Issue 22 considered closed.

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Washington Public Power Supply System

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November 11, 1983
G02-83-1044

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
NUREG-0737, TMI-2 ACTION PLAN,
ITEMS II.K.1.10 AND II.K.1.5,
CONFIRMATORY ISSUE 22

II.K.1.10

TMI-2 Action Plan Item II.K.1.10 is concerned with ensuring operability of an Engineered Safety Feature (ESF) system following its removal from service. At WNP-2, there exists four procedures (attached) which may affect the operability of ESF systems. They are:

- 1) PPM 1.3.7 - Work Request
- 2) PPM 1.3.8 - Equipment Clearance and Tagging
- 3) PPM 1.3.9 - Control of Jumpers, Lifted Leads and Mechanical Jumpers
- 4) PPM 1.5.1 - Technical Specification Surveillance Testing Program

All four of these procedures require the Shift Manager's review and approval prior to the execution of the work on an ESF system or component and also prior to returning the component or system to operable status. In executing this review, the Shift Manager is assuring that all program and technical requirements for the removal of and the return to operable status are met. Procedures 1.3.8, 1.3.9, and 1.5.1 provide for the additional controls of independent verification.

Boo!
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A. Schwencer
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There are three additional administrative procedures which address the issue of system operability. They deal primarily with keeping the operating shift informed of system operability. These procedures are also attached and include:

- 1) PPM 1.3.1 - Standing Orders/Night Orders
- 2) PPM 1.3.4 - Operating Data and Logs
- 3) PPM 1.3.6 - Shift Turnover

A WNP-2 design feature includes an inoperative status panel which will automatically display the inoperative status of primary ESF components.

These procedures and programs provide adequate controls of safety related equipment at WNP-2.

II.K.1.5

The full procedure and program controls outlined for item II.K.1.10 also apply to TMI-2 Item II.K.1.5. Additional clarification concerning this item is that all ESF systems are aligned and are operated as outlined in their respective Volume 2 Plant Procedures Manual. These system alignments are initially independently verified. Our program also requires independent verification following each major outage. In addition, the principle ESF components have direct control board status indication to alert the operator and ensure their proper alignment. Critical manual valves are locked in their required position. These valves require Shift Manager approval prior to deviating from their required position. In addition, independent verification is required when they are returned to their normal position.

These procedures and programs provide adequate controls of ESF equipment at WNP-2. We feel that concerns to these items are resolved and the issue is closed.

Should you have any further questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

Alan Hoster

G. C. Sorensen, Manager
Regulatory Programs

JWB/tmh
Attachment

cc: R Auluck - NRC
WS Chin - BPA
AD Toth - NRC Site

