



Since WNP-2 achieved its initial criticality on January 19, 1984, the plant is required to be inerted by July 19, 1984, per the 10 CFR 50.44 requirement set forth above. By its letter dated May 11, 1984, the licensee requested a temporary exemption from the requirement of 10 CFR 50.44 so that it may continue operating the plant with a non-inerted containment during the balance of the initial startup test program as originally planned.

The exemption from the regulation is required in order to complete the balance of the power ascension test program (PATP) in accordance with the licensee's test plan. The licensee's test plan is based on maintaining the containment in a non-inerted condition until after completing the 100% rated thermal trip test, a condition which normally would be expected to occur within about 120 effective full power days of core burn-up. No changes are being made in the maximum full power days of core burn-up normally expected before inerting is required. In fact to assure this, the maximum expected value of 120 effective full power days is made part of the proposed action. The licensee's PATP schedule has not been maintained as originally planned. This has resulted in a simple stretch out of the time required to complete all post criticality PATP tests.

It is advantageous to operate the reactor without inerting during the PATP, as an uninerted containment would permit unscheduled inspections or identification of possible problems important to safety during this period. The anticipated high frequency of containment entries during the PATP period



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and the required deinerting and re-inerting time (about 24 hours) would tend to discourage early and frequent containment entries for identifying and correcting any potential safety problems before they become serious safety problems.

III.

We have evaluated the licensee's requested exemption. The NRC staff believes that to now require inerting before the PATP tests have been completed could result in less assurance of safety, because of the added time and/or decreased ability to directly examine and evaluate components and systems inside containment while the PATP tests are under way. Completing the PATP tests with an uninerted containment then would reduce the likelihood of development of an event requiring protective safety actions both during the period of exemption and later. Because of the low level of fission product inventory during the PATP period, (less than 10 effective full power days (FPD) at present increasing to the maximum of only 120 FPD) and the short duration anticipated for the exemption (until about September 1984), there is an extremely low likelihood that the inerting system would be required. The inerting system is now fully operable and ready for service if needed.

Based on the information provided by the licensee and the staff's assurance that the remainder of the PATP tests will be performed in essentially the same manner as originally planned with respect to the magnitude and duration of



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The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that every entry should be supported by a valid receipt or invoice. This ensures transparency and allows for easy auditing of the accounts.

In the second section, the author details the various methods used to collect and analyze data. This includes both primary and secondary research techniques. The primary research involved direct observation and interviews with key stakeholders, while secondary research focused on reviewing existing literature and industry reports.

The third part of the document presents the findings of the study. It shows that there is a significant correlation between the variables being studied. The data indicates that as one variable increases, the other tends to decrease, suggesting an inverse relationship. These findings are supported by statistical analysis and are consistent with previous research in the field.

Finally, the document concludes with a series of recommendations based on the research findings. It suggests that organizations should implement certain practices to improve their performance and efficiency. These recommendations are grounded in the evidence gathered during the study and are intended to provide practical guidance for decision-makers.

power levels for each remaining PATP test, the NRC staff concludes that there will be no increase in the risks of operation through completion of the PATP tests with the proposed limited exemption regarding initial inerting over the risks that were contemplated for the duration of the PATP tests at the time the plant was licensed. Therefore, since there is no perceived increased risk by the mere fact of extending the time allowed for completion of the PATP tests under uninerted conditions, the NRC staff finds that operation would be as safe under the conditions proposed by the exemption as it would have been had the tests been completed in the shorter calendar time of six months after initial criticality.

The inerting requirement resulted from a staff judgement that the safety benefits attributable to having an inerted containment during normal operations outweighed the associated disadvantages. This judgement does not prevail during the PATP because of the need for frequent containment entries for inspection and surveillance purposes. The staff has reviewed the licensee's submittals, agrees with the statements, and finds that the proposed exemption from 10 CFR 50.44, paragraph (c)(3)(i) is acceptable.

IV.

Accordingly, the Commission has determined that, pursuant to 10 CFR 50.12, the exemption is authorized by law, will not endanger life or property or the common defense and security and is otherwise in the public interest. Therefore, the Commission hereby grants the exemption as follows:



"An exemption is granted from the requirements of 10 CFR 50.44 Paragraph (c)(3)(i) until either the required 100 percent rated thermal power trip startup tests have been completed or the reactor has operated for 120 effective full power days, whichever is earlier."

Pursuant to 10 CFR 51.32, the Commission has determined that the issuance of the exemption will have no significant impact on the environment (49 FR 29885).

A copy of the Commission's Safety Evaluation dated July 27, 1984, related to this action is available for public inspection at the Commissions Public Document Room, 1717 H Street, N. W., Washington, D.C., and at the

This Exemption is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

Darrell G. Eisenhut, Director
Division of Licensing, NRR

Dated at Bethesda, Maryland
this July 27, 1984

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