

April 14, 1986

Docket No. 50-397

Washington Public Power Supply System  
P. O. Box 968  
Richland, Washington 99352

Attention: Mr. G. C. Sorensen, Manager  
Regulatory Programs

Gentlemen:

Subject: NRC Inspection Finding Related to NUREG 0737, Item II.F.1,  
Attachment 2, Inspection Report No. 50-397/85-20, Unresolved  
Item 85-20-04

As a part of Region V's post implementation review of the adequacy of your reactor building POST LOCA sampling system, a question was raised concerning the affect sample line plate out might have on your ability to quantify the amount of iodine released following an accident.

In response to this question, you submitted "Nuclear Plant No. 2 Position on Iodine Plate-out" in a letter to Mr. J. B. Martin, Regional Administrator, dated June 27, 1985 (G02-85-347).

In your position you contend that requiring you to evaluate the iodine plate out in your effluent sample lines (required by Item II.F.1.2 of NUREG-0737) is not appropriate since, due to the large exposed metal areas in BWRs, all "plateable" iodine species will have been removed before they reach the sampling location. You base this position on the design basis analysis in the FSAR.

We have reviewed your rational and do not concur with your position. It is our position that each BWR licensee (including WNP-2) must show that their system provides a representative sample as required by NUREG 0737, Item II.F.1.2. Our position is based on the following considerations:

It is inappropriate to use design basis analysis as reasoning for not complying with a NUREG-0737 item. The requirements in NUREG-0737 are intended to mitigate the consequences of an accident which may or may not have been specifically considered in the design basis analysis. Therefore, the NUREG-0737 requirements are in addition to those requirements mandated by design basis analysis.

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THE UNITED STATES OF AMERICA  
DO hereby certify that  
[Name] is a citizen of the United States of America.

Witness my hand and seal this [Date] day of [Month], 19[Year].

Attest: [Signature]  
[Title]

THE UNITED STATES OF AMERICA  
DO hereby certify that [Name] is a citizen of the United States of America.

Witness my hand and seal this [Date] day of [Month], 19[Year].

Attest: [Signature]  
[Title]

THE UNITED STATES OF AMERICA  
DO hereby certify that [Name] is a citizen of the United States of America.

Witness my hand and seal this [Date] day of [Month], 19[Year].

Attest: [Signature]  
[Title]