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Docket No.: 50-397

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Mr. G. C. Sorensen, Manager  
Regulatory Programs  
Washington Public Power Supply System  
P.O. Box 968  
3000 George Washington Way  
Richland, Washington 99352

Dear Mr. Sorensen:

SUBJECT: WNP-2 PROPOSED RESOLUTION OF SPURIOUS OPENING OF RHR-V-8 AND  
RHR-V-9 IN THE EVENT OF A CONTROL ROOM FIRE

On May 13, 1987 I wrote to you asking that you advise NRC of modifications which WPPSS will make to preclude spurious opening of high low interface valves RHR-V-8 and RHR-V-9 in the event of a control room fire. Your response of August 20, 1987 (G02-87-232) declared that your preferred action is to provide a transfer switch on the remote shutdown panel and to have control of RHR-V-8 transferred to the remote panel during normal operation. Your response identified several items which WPPSS must resolve before your preferred action can be implemented. Since your letter reflects some uncertainty as to licensing procedures and NRC staff positions pertinent to your preferred action I believe that a meeting with your engineering staff may serve to ensure completion of your modifications in accordance with the schedule which you proposed.

We are open to discussing the points which you raised in your August 20th letter and thus are not taking a position on your preferred action at this time. However, I am making some preliminary comments, again in the spirit of expediting the completion of this very important matter.

You stated that as you are proposing the action, with control of RHR-V-8 transferred to the remote shutdown panel, the RHR permissive interlock (reactor pressure high) would be bypassed. You are correct that this would constitute an unreviewed safety question requiring prior NRC approval. Our initial reaction is that modifications should not be made which would permit operation of the valves with the interlocks bypassed.



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Your letter also inquired about technical specification changes needed to reflect the modifications to the controls. You asked us to identify other licensed facilities which have amended their technical specifications because of similar design or operating changes. We are not aware of any facility which has taken the type of corrective action for which you have indicated a preference. Shoreham has a pressure interlock outside of the control room for each of its RHR suction lines. Thus a control room fire could not result in spurious opening of the high/low pressure interface. Nine Mile Point Unit Two elected to lock power out to one of the RHR suction line valves during power operation.

Because of these site specific differences in achieving isolability, we can not provide a directly applicable example technical specification. However the changes do not appear to be particularly complicated. Technical Specification 3.6.3 (Page 3/4 3-10) has the objective of ensuring isolability of the containment. Valves RHR-V-8 and RHR-V-9, however, are normally in the containment isolation position. What you are trying to achieve with the proposed transfer switch is to avoid spurious opening. Thus there is no real conflict between the proposed action and the containment isolation objective.

When control of RHR-V-8 is transferred back to the control room so that the Residual Heat Removal System can be placed into service, spurious opening will no longer be of concern and the valve will be operable in the event that an isolation signal occurs. Therefore, it would appear that the objective of Technical Specification 3.6.3 will be met. A footnote might be added to Table 3.6.3-1 to document the normal situation regarding RHR suction line isolation control.

It appears that your concern over Table 3.3.2-1 is tied to your proposal that the interlocks might be bypassed. Otherwise, the clarification to Table 3.6.3-1 would appear to suffice.

We expect that you will submit FSAR and Technical Specification amendments in a timely manner to permit our review and then your implementation of the action before the end of the next refueling outage. We would recommend an early meeting to discuss these matters if necessary to ensure that objective is met.

Sincerely,

Original signed by:  
George W. Knighton

George W. Knighton, Director  
Project Directorate No. V  
Division of Reactor Projects - III,  
IV, V and Special Projects  
Office of Nuclear Reactor Regulation

cc: See next page

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[The text in this section is extremely faint and illegible due to the quality of the scan. It appears to be a large block of text, possibly a list or a series of paragraphs, but the individual characters and words cannot be discerned.]

Mr. G. C. Sorensen, Manager  
Washington Public Power Supply System

WPPSS Nuclear Project No. 2  
(WNP-2)

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