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 SORESEN, G.C.      Washington Public Power Supply System  
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SUBJECT: Requests exemption from filing requirements of 10CFR55.45(b)(2)(iii) & (iv).

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

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April 4, 1990  
G02-90-068

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21  
REQUEST FOR EXEMPTION FROM 10CFR55.45(b)(2)(iii)  
FILING DEADLINE, AND 10CFR55.45(b)(2)(iv)

Reference: Letter, G02-89-148, GC Sorensen (SS) to KE Perkins (NRC),  
"Operator Licensing Examinations (Generic Letter 89-12)",  
dated August 30, 1989

The Washington Public Power Supply System (Supply System) hereby requests an exemption from the filing requirements of 10CFR55.45(b)(2)(iii) to allow for our submittal of NRC Form-474, "Simulation Facility Certification" after the March 26, 1991 deadline provided in the rule. Additionally, we further request an exemption from the requirements of 10CFR55.45(b)(2)(iv) to allow us to continue to administer the simulation facility portion of the operating tests on the current WNP-2 simulator as upgraded.

It is the Supply System's intent to comply with 10CFR55.45(b) by certifying a plant referenced simulator facility in accordance with 10CFR55.45(b)(1)(ii). In the fall of 1988, after assessing the capabilities of our present simulator pursuant to the requirements for its certification, the Supply System elected to replace its current simulator. Even though the existing simulator could have been extensively upgraded to meet minimum requirements, the decision was made to purchase a state of the art simulator, at significant expense, in order to be able to provide our operations personnel with the best training available, both now and for future expansion as needed. On January 16, 1989, the Supply System entered into contract with Westinghouse Electric Corporation for construction of a certifiable plant referenced simulator.

This request provides only temporary relief from the regulatory requirement. Even though we have made a good faith effort to comply, based upon the current development schedule, the testing of our replacement simulator will not be complete by the March 26, 1991 filing deadline. For this reason we will not have sufficient information to attest to the new simulator's performance by the required deadline. It is the Supply System's intent to file for certification following the satisfactory completion of all acceptance testing.

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REQUEST FOR EXEMPTION FROM 10CFR55.45(B)(2)(III)  
FILING DEADLINE, AND 10CFR55.45(B)(2)(IV)

In August, 1989 in its response to Generic Letter 89-12, the Supply System indicated its' intent to certify the plant referenced simulator under development. Our purpose remains as stated then; to have our new simulator certified prior to use for operator exams in March 1992. We continue to expect completion of the new simulator in July of 1991.

To require WNP-2 to comply with the current schedule for certification would result in undue hardship and expense. The present schedule for the new simulator has been accelerated as much as was reasonably achievable. To attempt to accelerate even more would be at great expense and probably counter-productive relative to the quality of the final product. Sending the WNP-2 operators to another facility for simulator training would not only be expensive but the training they would likely receive would be deficient relative to the use of our own plant-specific simulator given the success of our upgrade program as discussed below.

Approval of these exemption requests will not endanger the public health and safety. During the past year the Supply System has performed upgrades to its existing simulator facility to support its continued use until receipt of its new simulator. We have replaced the simulator's boiler and recirculation models to allow training on an increased number of transient and off-normal operating conditions. Significant changes were also made to key main energy loop models to support the simulator's improved malfunction response.

Based on the above arguments and in accordance with the provisions of 10CFR50.12, the Supply System requests the following exemptions:

- 1) A specific exemption to defer the filing requirements of 10CFR55.45 (b)(2)(iii) to submit NRC Form-474 no later than December 31, 1991, and
- 2) A specific exemption to 10CFR55.45(b)(2)(iv) to allow us to continue to use the existing simulator, as upgraded, until the new simulator's certification is complete.

We believe that our actions attest to our determination to meet the requirements pursuant to simulator certification. We believe that the development schedule represents unique circumstances, such as those recognized by the Commission in the Supplementary Information Published with the Final Rule to 10CFR55.45 (52 FR 9453) to allow deviation from the time requirements established by the rule.

Should you have any questions regarding this matter, please feel free to contact me or D.W. Fraley, Manager, Simulator Projects at (509) 377-8166.

Very truly yours,

*Alan Hoster for*

G. C. Sorensen, Manager  
Regulatory Programs

cc: JB Martin - NRC RV  
NS Reynolds - BCP&R  
RB Samworth - NRC  
DL Williams - BPA/399  
NRC Site Inspector - 901A

STATE OF WASHINGTON )  
 )  
COUNTY OF BENTON )

Exemption from 10CFR55.45(b)(2)(iii)  
Subject: and 10CFR55.45(b)(2)(iv)

I, A. G. HOSLER, being duly sworn, subscribe to and say that I am the Manager, WNP-2 Licensing, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE April 4, 1990

Alan Hoser  
A. G. HOSLER, Manager  
WNP-2 Licensing

On this day personally appeared before me A. G. HOSLER to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 4th day of April, 1990.

Bernice Kasko  
Notary Public in and for the  
State of Washington

Residing at Kennecook, Wa

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