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WASHINGTON PUBLIC POWER SUPPLY SYSTEM DOCKETED  
USNRC

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

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July 5, 1990  
Docket No. 50-397  
G02-90-119

OFFICE OF SECRETARY  
DOCKETING & SERVICE  
BRANCH

Mr. Samuel J. Chilk, Secretary  
U. S. Nuclear Regulatory Commission  
Washington, DC 20555  
Attn: Docketing and Services Branch

Dear Mr. Chilk:

Subject: COMMENTS ON PETITION FOR RULEMAKING - FREQUENCY OF FSAR REVISIONS (55 FR 18608)

On May 3, 1990, the NRC published (55 FR 18608), a Petition for Rulemaking by Yankee Atomic Electric Company seeking a change to the current requirements of 10 CFR 50.71(e)(4) that each licensee submit an annual revision to its Final Safety Analysis Report (FSAR).

The Washington Public Power Supply System has reviewed the petition and supports the concept being proposed by the petitioner. We have also reviewed proposed comments of NUMARC on the petition and support the comments to be filed by NUMARC.

The Supply System operates in a region that generates most of its base load electricity from a large hydro system. Because of the ability of the hydro system to meet regional needs during the spring and early summer months (a period of relatively low loads and high river flows), the Supply System's nuclear power plant is typically not needed during this period. Consequently, we operate on an annual fuel cycle and our annual FSAR update is typically submitted in the September-October time frame. This update brings the plant current to six months prior to submittal and does not include the most recent outage work.

The petition requests that FSAR updates be submitted six months after the refueling outage. NUMARC is requesting that this period be extended to nine months after the refueling outage. For plants on an 18 or 24 month refueling cycle, these recommendations are appropriate and we encourage the commission to revise the regulations accordingly. However, for an organization such as the Supply System with an annual refueling outage, the period six to nine months after a refueling outage is extremely busy for our Engineering staff as they prepare for the next outage. For

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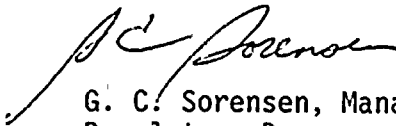
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this reason, we have selected the period 3-4 months after the refueling outage as the best time to submit our annual update. We recommend that the commission maintain flexibility in the FSAR update filing as recommended by NUMARC.

We appreciate this opportunity to participate in the development of NRC regulations. Should you have any questions about our comments, please contact me at (509) 372-5238.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs (MD 280)

GCS/tlr

cc: C. J. Bosted, NRC (901A)  
N. S. Reynolds, BCP&R  
T. E. Tipton, NUMARC  
D. L. Williams, BPA (399)

