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 AUTH. NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 FAULKENBERRY, B. Region 5 (Post 820201)

SUBJECT: Clarifies 931117 request for discretionary enforcement for
 TS 3/4.3.2, "Isolation Actuation Instrumentation," in
 response to NRC 931118 notice of enforcement discretion.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 24, 1993
G02-93-274

Docket No. 50-397

Mr. B. H. Faulkenberry
Regional Administrator
U.S. Nuclear Regulatory Commission
Region V
1450 Maria Lane
Walnut Creek, CA 94596-5368

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REC'D
NRC
REGION V

Dear Mr. Faulkenberry:

Subject: **WNP-2, OPERATING LICENSE NPF-21
CLARIFICATION OF THE NOVEMBER 17, 1993 REQUEST FOR
DISCRETIONARY ENFORCEMENT**

- References:
- 1) Letter GO2-93-271, dated November 17, 1993, JV Parrish (SS) to BH Faulkenberry (NRC), "Request for Discretionary Enforcement for Technical Specification 3/4.3.2, Isolation Actuation Instrumentation"
 - 2) Letter, dated November 18, 1993, KE Perkins (NRC) to JV Parrish (SS), "Notice of Enforcement Discretion for Washington Public Power Supply System Regarding WNP-2"

Reference 1 requested discretionary enforcement from the response time testing requirements for isolation actuation instrumentation. It was determined during a programmatic review of the Technical Specification surveillance program that certain relays in the Isolation Actuation Instrumentation, Technical Specification 3.3.2, had not been response time tested in accordance with the Technical Specification requirements. The discretionary enforcement was required to provide sufficient time to perform the required testing in a controlled and deliberate manner. Sufficient time was not available to perform the required testing within the Technical Specification required 24 hours.

At the bottom of page 3 of Reference 1 the Supply System discussed compensatory measures to support the request for discretionary enforcement. The expected response times for the untested relays, based on completed testing of similar relays, was provided. The last sentence on page 3 stated "Comparing these expected values to the remaining time available for the required

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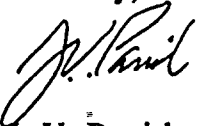
**CLARIFICATION OF THE NOVEMBER 17, 1993 REQUEST
FOR DISCRETIONARY ENFORCEMENT**

actuation response times provides reasonable assurance the Technical Specification response times will be met." During a discussion with Region V management on the morning of November 17, 1993, it was clear that this statement did not effectively communicate the status of Supply System efforts to identify and resolve the response time testing deficiencies. In response to NRC concerns, the Supply System clarified the status of its response time testing and indicated that certain information still required verification. Subsequent to the discussion with Region V management the Supply System verified on November 17, 1993, that sufficient margin existed between the Technical Specification required response times and the cumulative response times for logic components already tested such that the expected response time of untested relays would not exceed the margin.

Starting on November 16, 1993, work progressed to resolve the identified Technical Specification response time testing deficiencies. On November 20, 1993, through the work of numerous personnel and organizations, the Supply System successfully completed response time testing of the Isolation Actuation Instrumentation for which discretionary enforcement was granted. The response time of the relays was consistent with the expected response times cited in Reference 1.

It is our intent in every communication with the Staff to provide complete and accurate information. We will make every effort to ensure that both our written and verbal communications lead to a clear understanding of the state of WNP-2.

Sincerely,



J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations

DAS/bk

cc: Document Control Desk - NRC
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 927N