



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

January 14, 1994

Docket No. 50-397

Mr. J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations
Washington Public Power Supply System
P.O. Box 968
Richland, Washington 99352-0968

Dear Mr. Parrish:

SUBJECT: NOTICE OF ENFORCEMENT DISCRETION FOR WASHINGTON PUBLIC POWER
SUPPLY SYSTEM REGARDING WASHINGTON NUCLEAR PROJECT UNIT NO. 2
(WNP-2)(TAC NO. M88506)

On January 11, 1994, at approximately 4:50 p.m. EST, you requested the U.S. Nuclear Regulatory Commission (NRC) to exercise its discretion not to enforce compliance with the required actions of Technical Specification (TS) 3.3.3, "Emergency Core Cooling System Actuation Instrumentation." You informed the NRC that WNP-2 was not in compliance with the requirements of TS 3.3.3, Table 3.3.3-3 after 9:15 p.m. EST on January 10, 1994, because portions of the Low Pressure Core Spray (LPCS) and Residual Heat Removal (RHR) valve actuation and pump start logic circuitry had not been fully response-time tested. Without this enforcement discretion, the plant would be required to enter Action Statement 30 of Table 3.3.3-1 at 9:15 p.m. EST on January 11, 1994, and with all low pressure emergency core cooling systems (ECCS) declared inoperable, TS 3.0.3 would require the plant to be in at least Startup within the next 6 hours, at least Hot Shutdown within the following 12 hours, and at least Cold Shutdown within the subsequent 24 hours. You requested that enforcement discretion be granted until an emergency TS change request is submitted to and approved by the NRC. The emergency TS change requested by separate letter dated January 13, 1994, would defer the response time testing until startup from the next cold shutdown, but no later than the startup from the Spring 1994 refueling outage. You requested this action to avoid the potential for unnecessary actuations or disabling of ECCS during testing, to avoid the potential for a plant trip during testing, and to avoid a plant transient and reduce both operational and shutdown risk. Your letter dated January 13, 1994, documented your request.

You provided justification for continued operation based on completed functional testing of the affected circuitry, the historic reliability of the affected relays and associated contacts, a typical relay operating time of approximately 100 milliseconds, and the margin between current operating times of tested portions of the circuit and the requirements of TS Table 3.3.3-3 for ECCS response time of the LPCS system. You stated that the Plant Operations Committee (POC) had reviewed and approved your request before you initially contacted the NRC for enforcement discretion, and that the POC also reviewed

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Mr. J. V. Parrish

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and approved your written request. You further stated that no additional compensatory measures were planned or necessary to support your request.

Based on our review of your justification, we have concluded that this course of action involves minimal or no safety impact, and we are clearly satisfied that this exercise of enforcement discretion is warranted from a public health and safety perspective. Therefore, we are exercising our discretion not to enforce compliance with TS 3.3.3 action statements for those components identified in your January 13, 1994, Request for Enforcement Discretion for the period from 4:50 p.m. EST until we have completed action on your emergency TS request dated January 13, 1994. This letter confirms our verbal granting of enforcement discretion during a conference call between the Supply System and NRC staff on January 11, 1994. However, we will consider enforcement action, as appropriate, for the conditions that led to the need for this exercise of enforcement discretion.

Sincerely,

Original Signed by
Theodore R. Quay for

Elinor G. Adensam, Assistant Director
for Regions IV and V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

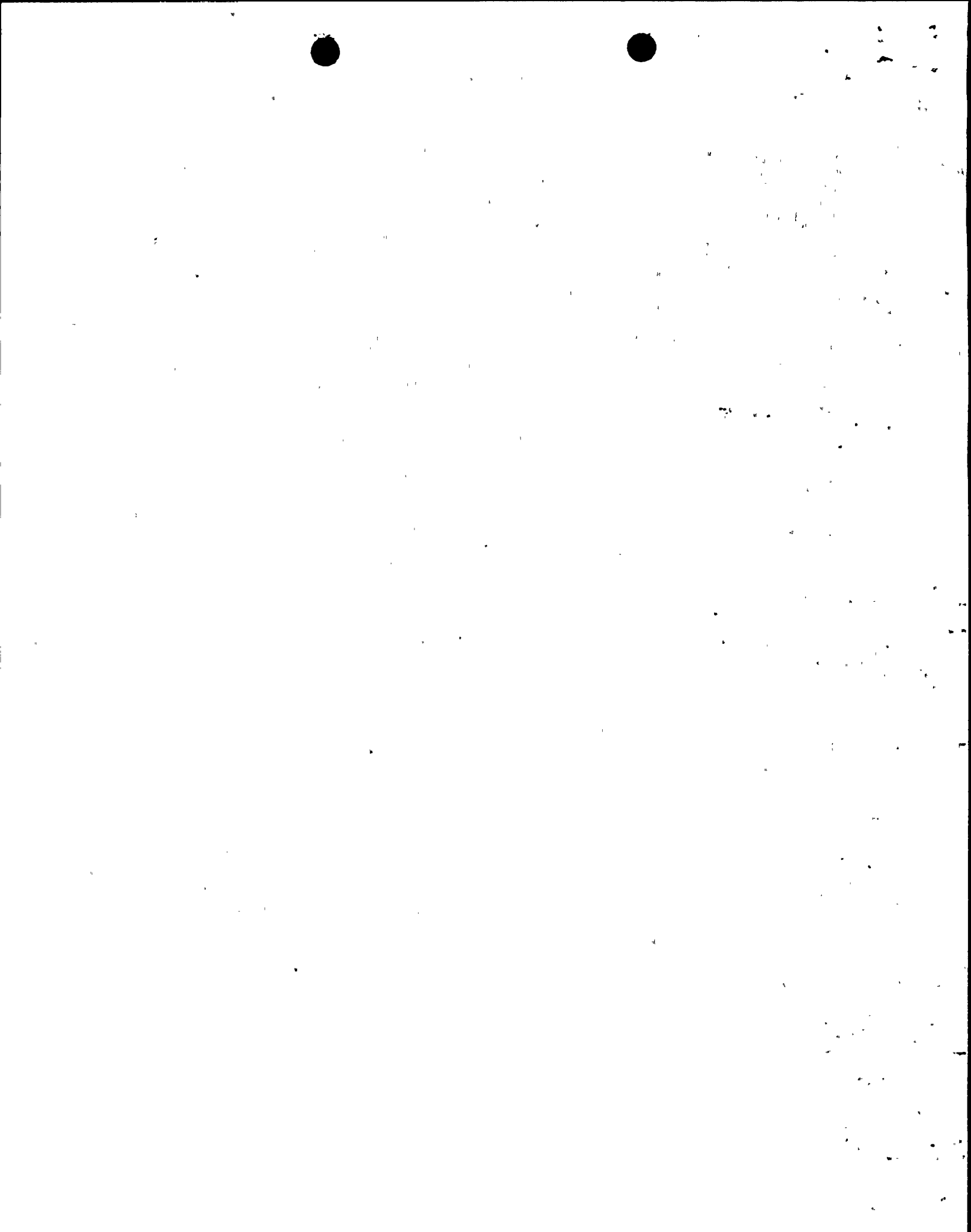
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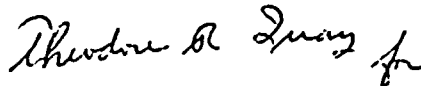
Mr. J. V. Parrish

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Sincerely,



Elinor G. Adensam, Assistant Director
for Regions IV and V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

cc: See next page

Mr. J. V. Parrish
Washington Public Power Supply System

WPPSS Nuclear Project No. 2
(WNP-2)

CC:

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