

UNITED STATES NUCLEAR REGULATORY COMMISSION 50-397

WASHINGTON, D.C. 20555-0001

May 25, 1995

Mr. J. V. Parrish (Mail Drop 1023) Vice President Nuclear Operations 3000 George Washington Way Washington Public Power Supply System P.O. Box 968 Richland, Washington 99352-0968

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SUBJECT: PROCEDURES FOR CONTROL ROOM FIRES AT WASHINGTON PUBLIC POWER SUPPLY SYSTEM NUCLEAR PROJECT NO. 2 (WNP-2) (TAC NO. M91496)

Dear Mr. Parrish:

The staff has evaluated your request, submitted by letter dated January 25, 1995, for prior NRC staff approval for a second operator action prior to control room evacuation in the event of a fire. Your request was submitted subsequent to a meeting between Supply System and NRC staffs on November 15, 1995, to discuss proposed courses of action for dealing with concerns related to the WNP-2 fire protection program.

We have evaluated the need for prior NRC review and approval of additional operator actions. The fire protection license condition for WNP-2, License Condition 2.C.14., allows the licensee to make changes to the NRC-approved fire protection program without prior NRC approval if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire. There are no specific regulatory requirements regarding operator actions prior to evacuating the control room in the event of a fire. In Generic Letter (GL) 86-10, "Implementation of Fire Protection Requirements," the NRC staff stated that "the only manual action in the control room prior to evacuation usually given credit for is the reactor trip. For any additional control room actions deemed necessary prior to evacuation, a demonstration of the capability of performing such actions would have to be provided. Additionally, assurance would have to be provided that such actions could not be negated by subsequent spurious actuation signals resulting from the postulated fire."

In its submittal, the Supply System stated that its implementation of the actions outlined in their January 25, 1995, letter was based on the fire protection license condition. The Supply System also stated that the second operator action is consistent with the guidance of GL 86-10. On these bases, the NRC staff concludes that prior Commission review and approval of the proposed operator action is not necessarily required. The licensee should evaluate the change to their licensing basis pursuant to 10 CFR 50.59. If this review identifies that the change constitutes an unreviewed safety question or involves a change to the plant technical specifications, then

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prior Commission approval would be required. Confirmation of the adequacy of any change is subject to NRC staff inspection.

Please contact me at (301) 415-1352 if you have any questions.

Sincerely,

ORIGINAL SIGNED BY:

James W. Clifford, Senior Project Manager Project Directorate IV-2 Division of Reactor Projects III/IV Office of Nuclear Reactor Regulation

Docket No. 50-397

cc: See next page

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## Mr. J. V. Parrish

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cc: Mr. J. H. Swailes WNP-2 Plant General Manager Washington Public Power Supply System P. O. Box 968 Richland, Washington 99352-0968

Corporate Counsel (Mail Drop 396) Washington Public Power Supply System 3000 George Washington Way Richland, Washington 99352-0968

Mr. Frederick S. Adair, Chairman Energy Facility Site Evaluation Council P. O. Box 43172 Olympia, Washington 98504-3172

Mr. D. A. Swank (Mail Drop PE20) WNP-2 Licensing Manager Washington Public Power Supply System P.O. Box 968 Richland, Washington 99352-0968

Mr. Paul R. Bemis (Mail Drop PE20) Director, Regulatory and Industry Affairs Washington Public Power Supply System P.O. Box 968 Richland, Washington 99352

Regional Administrator, Region IV U.S. Nuclear Regulatory Commission Harris Tower & Pavilion 611 Ryan Plaza Drive, Suite 400 Arlington, Texas 76011-8064

Chairman Benton County Board of Commissioners P.O. Box 69 Prosser, Washington 99350-0190

Mr. R. C. Barr, Senior Resident Inspector U.S. Nuclear Regulatory Commission P.O. Box 69 Richland, Washington 99352-0968

M. H. Philips, Jr., Esq. Winston & Strawn 1400 L Street, N.W. Washington, DC 20005-3502 - 3 -

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