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SUBJECT: Provides update of process re revs to WNP-2 inservice testing program plan for pumps & valves that result from change…in .classification. Process will incorporate guidelines provided in NUREG-1482, Section 7.2, "Design Basis Reviews."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

October 2, 1997 GO2-97-185

Docket No. 50-397

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

Gentlemen:

Subject:

WNP-2, OPERATING LICENSE NPF-21,

INSERVICE TESTING PROGRAM PLAN FOR PUMPS AND VALVES,

PLAN SCOPE UPDATE

References:

- 1) Letter, dated September 12, 1996, KE Brockman (NRC) to JV Parrish (SS), "NRC Inspection Report 50-397/96-11 and Notice of Violation"
- 2) NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants, April 1995"

The Supply System has returned the quality and seismic classification of the RCIC System to the classifications that were described in the FSAR when the plant was initially licensed. These classifications, Quality Class I and Seismic Category I, are consistent with the classifications established for a safety system. The action to return the classifications to their original status was taken as a result of NRC Inspection 96-11.

The purpose of this letter is to provide the Staff with an overview of the process that the Supply System will follow in making any necessary revisions to the WNP-2 Inservice Testing Program Plan for Pumps and Valves that result from the change in classification. The process will incorporate the guidelines provided in NUREG-1482 Section 7.2, Design Basis Reviews (Reference 2). It is anticipated that some components not currently in the Plan will be added and the testing requirements for others may require revision to include consideration of changes in their safety function.

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Page 2 INSERVICE TESTING PROGRAM FOR PUMPS AND VALVES PROGRAM SCOPE UPDATE

In accordance with NUREG 1482, Section 7.2, the following description of the review process is provided.

(1) The process for performing the programmatic review:

The initial task includes performing a design basis review for each of the RCIC System components. The design basis review determines the component status in relationship to ASME Section XI (OMa-1988, Addenda to the OM-1987 Edition, Part 6 and Part 10) as required by 10 CFR 50.55a(f) and the current scope of the WNP-2 Inservice Testing Program Plan (IST) for the second ten-year interval.

(2) The actions to be taken when a component or test not previously in the IST Program is identified:

Changes to the IST Program Plan and implementing procedures will be completed by 12/31/97. If Code testing requirements cannot be met due to design or system limitations (e.g., lack of process instrumentation), partial or alternative testing will be implemented while Code relief is being requested.

In addition, affected components will be evaluated with respect to WNP-2 Technical Specification SR 3.0.3 and action taken, if required, in accordance with the applicable Limiting Condition for Operation.

(3) The schedule for performing the testing once the need has been identified:

Testing of the components will commence in accordance with the changes to the IST Program Plan and implementing procedures which will comply with the Code testing frequency requirements.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. PJ Inserra at (509) 377-4147.

Respectfully,

PR Bemis

Vice President, Nuclear Operations

Mail Drop PE23

cc: EW Merschoff - NRC RIV

DL Williams - BPA/399

PD Robinson - Winston & Strawn

NRC Sr. Resident Inspector - 927N

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TG Colburn - NRR

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