

Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

Docket No. 50-397

August 24, 1984

G02-84-0479

Mr. T. W. Bishop, Director
Division of Reactor Safety and Projects
U.S. Nuclear Regulatory Commission
Region V
450 Maria Lane, Suite 210
Walnut Creek, California 94596

Subject: NUCLEAR PLANT NO. 2
LICENSE NO. NPF-21
NRC INSPECTION 84-09
MAY 29, 1984

This is in response to your letter of July 25, 1984, informing us of the non-acceptability of our answer to Violation "A" of NRC Inspection 84-09. Apparently the unacceptability concerned our "Corrective Steps to be Taken" response. Based on this perception we will readdress NRC Inspection 84-09 Violation "A".

Our interpretation of WNP-2 Technical Specification 3.6.1.3 is as follows:

- 1) The intent is to provide a boundary for uncontrolled releases to the secondary containment during accident conditions.
- 2) Personnel access is allowed provided both air lock doors are not opened simultaneously.
- 3) Although the surveillance requirements include verification of the door interlock mechanism, neither action statement adequately addresses the follow-up action required for an inoperative interlock.

Using the above, it is our position that action statement a. most closely defines the action required for this Limiting Condition for Operation (LCO). However, it should be noted that neither air lock door is inoperative. Both doors are capable of providing a pressure boundary and can be verified leak tight by seal leak tests. Therefore, we have con-

REGION V

1984 AUG 27 PM 12:31

8409050271 840824
PDR ADOCK 05000397
PDR

RECEIVED
NRC

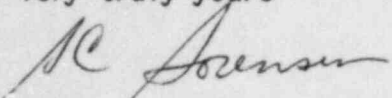
1E-01
110

Mr. T. W. Bishop
Page 2

Nuclear Plant No. 2 NRC Inspection 84-09

cluded that the intent of this technical specification allows for reactor operations to continue provided: 1) either air lock door is maintained closed and the interlock is returned to service within 24 hours; or 2) if the interlock cannot be returned to service within 24 hours, then at least one operable air lock door is to be locked closed at all times and verified to be closed at least once every 31 days. Thus, other conditions permitting, containment entries would be allowed with the above provision that one air lock door remain locked closed at all times. Locking the air lock doors provides assurance, comparable to the mechanical interlock, that both doors cannot be open simultaneously.

Very truly yours



G. C. Sorensen
Manager, Regulatory Programs

GCS:RLK:mm