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Washington Public Power Supply System

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Mr. J. B. Martin
Regional Administrator
U. S. NRC - Region V
1450 Maria Lane, Suite 210
Walnut Creek, CA 94596

Subject: SUPPLY SYSTEM NUCLEAR PROJECT NOS. 1 AND 3
READINESS REVIEW PROGRAM

PURPOSE

The purpose of this letter is to propose a program for the systematic and disciplined review of the Supply System's implementation of design and construction processes to increase the level of assurance that WNP-1 and 3 quality programs have been and will be accomplished in accordance with regulatory requirements.

BACKGROUND

The Supply System currently has two projects in extended construction delay. We are studying methods that would allow the construction of these projects to be effectively restarted with the projects brought to fuel load with a minimum of problems and delays.

As input to our study we have used our experiences at WNP-2, now operational, which had questions related to the quality of the plant's construction. A major reverification program was instituted to reconfirm the quality of construction. Late in construction the project was also exposed to an assessment by the NRC "CAT" Team. In addition to reviewing these major efforts at WNP-2, we also evaluated the efforts and current experiences of other utilities that have near term or recent licensed plants, along with the recommendations that were part of the NUREG-1055 Report to Congress (Improving Quality and the Assurance of Quality in Design and Construction of Nuclear Power Plants). We have concluded that a structured approach to the detection of possible quality problems needs to be instituted for our currently delayed construction projects.

The structured approach would be similar to the Readiness Reviews that were discussed in NUREG-1055 and would have distinct benefits. A series of formal assessments by the Supply System of the readiness to proceed, at critical stages of a project, would focus the necessary technical and management attention to assure that quality related problems would be detected. These Readiness Reviews would include involvement by the Nuclear Regulatory Commission staff.

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DISCUSSION

The Supply System has been in contact with Georgia Power Company and has reviewed their plans for performance of a series of Readiness Reviews. Our plans are not fundamentally different, however, our review program will necessitate a two phase approach. The first phase of the review program will deal with "Readiness to Resume Construction." This review will focus on the end products of both design and construction and will produce the initial incremental acceptance of work for the projects at their present stage of construction. The first phase of our review program will include the preservation programs in place, since the delays began, that assures continued integrity of quality. The preservation programs will also be included in the initial incremental acceptance of work.

When construction is resumed, the second phase of our review program will focus on the new control systems being used by our Construction Manager, Architect Engineer and Contractors, along with the output of these control systems. A series of reviews will be conducted to incrementally accept the project work as it progresses toward licensing and fuel load.

The proposed Readiness Review Program does not eliminate or diminish any authorities or regulatory responsibilities now assigned to, or exercised by the Nuclear Regulatory Commission or the Supply System. And the proposed Readiness Review Program does not fundamentally change the techniques of inspections or assurance of quality program activities. Rather, the Readiness Review Program is a management system which provides for the orderly planning and predictable execution of existing authorities and responsibilities.

The Readiness to Resume Construction phase of the review program, which includes the review of the preservation programs, is expected to begin in July 1985, at our WNP-3 project and continue for approximately three years. A separate similar program of reviews will begin at our WNP-1 project in 1986, and conclude approximately three years later.

CONCLUSION

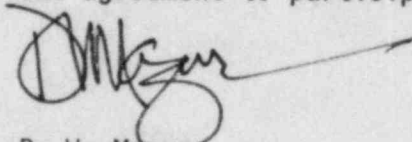
The Supply System considers that the proposed Readiness Review Program, including the Nuclear Regulatory Commission's agreement to participate in the program, will result in significant benefits. These benefits will include: enhanced assurance of the overall program acceptability resulting from the Supply System's self-assessment, combined with the phased independent Nuclear Regulatory Commission reviews; and improved stability by minimizing the potential for last minute identification of major programmatic problems. Other benefits resulting from this program are improved planning which will enhance the effective use of critical Nuclear Regulatory Commission and Supply System resources and improved predictability resulting from the early Nuclear Regulatory Commission determination of design and construction adequacy.

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The experience gained through the Supply System's performance of the Readiness Reviews at our delayed projects will provide a significant benefit to other delayed projects, since our program could then be used as a guide. The inclusion of a review of preservation programs will provide a basis for Nuclear Regulatory Commission and industry evaluation of the effect of extended construction delays.

PROPOSED ACTION

We would like to meet with your staff to present details of our review program and discuss the steps necessary to gain Nuclear Regulatory Commission approval and agreement to participate in the Readiness Review Program.

A handwritten signature in black ink, appearing to read 'D. W. Mazur', with a long horizontal line extending to the right from the end of the signature.

D. W. Mazur
Managing Director

cc: Mr. J. M. Taylor, NRC
Mr. H. R. Denton, NRC
Mr. G. T. Ankrum, NRC