Washington Public Power Supply System

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Docket Nos: 50-460 50-508

G01-86-0046 G03-86-134

March 3, 1986

Mr. V. Stello Acting Executive Director for Operations U. S. Nuclear Regulatory Commission Washington, D. C. 20555

Dear Mr. Stello:

Subject: FUTURE LICENSABILITY OF WNP-1 AND WNP-3

Reference:

- Letter, DW Mazur to WJ Dircks, same subject, February 15, 1985
- Letter, WJ Dircks to DW Mazur, same subject, May 3, 1985

My letter to Mr. Dircks (Reference 1) requested NRC comments on the future licensability of WNP-1 and WNP-3. Based on information provided in Reference 1, Mr. Dircks responded (Reference 2) that the NRC is "... not aware of any future regulatory changes that will likely seriously challenge the licensability of these plants prior to their completion in the early 1990s." (Copies of these letters are attached for your convenience.) Because of changes in the forecasts for electrical needs in the Northwest, operation of either plant in the early 1990s now appears unlikely, although still possible.

As you are aware, we have implemented a comprehensive preventive maintenance and preservation program to assure that quality is not compromised. The plants will be maintained in accordance with the terms of our construction permits and NRC regulations through the continued implementation of our NRC reviewed and approved QA program and preservation program for the duration of this shutdown period.

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Given the current circumstances, I find it necessary to ask for clarification of the NRC position regarding further deferral of our restart date. It is our understanding that the major issue of concern is not the length of our shutdown, but our need to preserve the equipment, structures and documentation such that future operational safety is not compromised by the shutdown period.

We are working with the NRC Staff and others in the industry to develop Commission policy on restart of deferred or canceled plants. We view the policy, along with other recent NRC rules (such as backfitting) as providing greater assurance that restart will not be severely impacted by the regulatory process. Nevertheless, I request your understanding of these issues and whether you foresee regulatory changes which could adversely impact the future licensability of WNP-1 and WNP-3 (B&W 205FA and CE-System 80/CESSAR) plants prior to their completion. At this time, the best planning available to us indicates that the plants may not be required in service until the late 1990s.

Your response is appreciated.

Very truly yours,

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D. W. Mazur Managing Director

- cc: T. Michaels/NRC
 - G. Knighton/NRC
 - E. Revel1/BPA (399)
 - N. Reynolds/BLCP&R
 - J. Stolz/NRC
 - J. Martin/Region V
 - C. Eschels/EFSEC