

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

January 27, 1998 GO2-98-016

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2 OPERATING LICENSE NPF-21, CHEMICAL DECONTAMINATION COMMITMENT MODIFICATION

- References: 1) Letter dated February 19, 1997, PR Bemis (SS) to NRC, "Request for Extension of Generic Letter 88-01 Category C Examination Interval"
 - Letter dated May 23, 1997, TG Colburn (NRC) to JV Parrish (SS), "Request fc." an Extension of the Examination Interval for IGSCC Category C Welds for Washington Nuclear Project No. 2"

Reference 1 requested deferral of Category C weld inspections and included a commitment by the Supply System to perform a chemical decontamination of the reactor recirculation system discharge piping during the R13 outage (Spring 1998). The main purpose for performing the chemical decontamination is to reduce drywell exposure rates prior to performing the Category C weld inspections. The commitment was made based upon estimated personnel dose reductions. We have reevaluated previous dose estimates and the cost effectiveness of performing the chemical decontamination and have concluded that it should not be performed.

Since the addition of iron and zinc injection systems in 1996, the reactor recirculation piping has realized source term reductions. For these Category C weld inspections the dose reduction from iron and zinc injection is estimated to be approximately 11 person-rem

In addition, the Supply System previously estimated the net dose reduction from a chemical decontantination to be 36.8 person-rem. We determined this value using an assumption where a reduced Cose from chemical decontamination was expected for fourteen of the seventeen weld inspections. Upon reevaluation, we have determined that a reduced dose from the chemical decontamination is expected for only ten of the seventeen welds to





CHEMICAL DECONTAMINATION COMMITMENT MODIFICATION Page 2

be inspected. We have also evaluated the dose reduction from chemical decontamination for other drywell activities and have determined that dose savings would only result from exposure rate reductions in transit paths and therefore was not used as a factor in the estimate. The reevaluated dose reduction for the R-13 outage from performing the chemical decontamination, factoring in the iron/zinc reductions, is estimated to be approximately 14 person-rem. We have estimated using GE dose model calculations that chemical decontamination, if performed, would provide an additional 3.5 person-rem dose reduction over two years, but no benefit beyond that.

With the project cost of the chemical decontamination estimated at approximately \$1.2 million, the cost per person-rem would be \$69,000 per person-rem. With these new dose reduction estimates and new cost estimates, chemical decontamination nc longer meets the ALARA criteria (<\$25,000 per person-rem) for being reasonably achievable.

The Supply System has determined that performing the chemical decontamination, previously committed to be performed in outage R13, will not reduce personnel dose as much as previously estimated nor is the chemical decontamination cost effective. Therefore, the chemical decontamination will not be performed in outage R13. By not performing the chemical decontamination, dose reductions will also be realized by shortening the overall R-13 outage.

Should you have any questions or desire additional information on this matter, please call ma or DW Coleman at (509) 377-4342.

Respectfully PR Bemis

Vice President, Nuclear Operations Mail Drop PE23

EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
C Poslusny, Jr. - NRR
NRC Sr. Resident Inspector - 927N
DL Williams - BPA/399
PD Robinson - Winston & Strawn