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ACCESSION NBR: 8401310027 DOC. DATE: 84/01/20 NOTARIZED: YES ^{PAG} DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Application for amend to License NPF-21, revising Tech Specs
 re intermediate-range noble gas activity monitor, LPCI sys
 injection permissive, containment isolation for fluid sys &
 diesel engine warmup period.

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Washington Public Power Supply System

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

January 20, 1984
G02-84-032

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. A. Schwencer, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PROJECT NO. 2
OPERATING LICENSE NPF-21,
REQUEST FOR LICENSE AMENDMENT

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Washington Public Power Supply System (WPPSS) hereby requests revisions to the Technical Specifications, Appendix A to the subject license.

Enclosed are revised WNP-2 technical specification pages 3/4 3-93, 3-94 and 3-95, 3/4 4-10, 3/4 6-22 and 6-31, 3/4 8-3, 3/4 8-18, 3/4 9-3, and 6-7. The following justification is provided in support of this amendment request:

- o Pages 3/4 3-93, 3-94, and 3-95

The alarm functions for the intermediate range noble gas activity monitor listed in table note 1 are not applicable in the WNP-2 design. A distinct note 7 has been added to accurately describe the channel functional test required for the intermediate range monitor. Since the intent of the surveillance is to verify channel operability only, in the interim until this change is approved, the Supply System will continue plant operation in support of the WNP-2 power ascension program and the intermediate range instruments as indicated in the attached changed pages.

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Paragraphs b. and d. should be deleted. The LPCI system injection permissive at WNP-2 does not employ a valve differential pressure-low logic. The logic employed senses reactor pressure. The b. and d. surveillance requirements were added to LaSalle Unit 1 Technical Specifications (page 3/4 4-8) for the period of time when the delta pressure logic system was in place. Once the logic was modified, the surveillance requirements are no longer required. The surveillance requirements, therefore, do not apply to WNP-2 since our logic was modified prior to issuance of our license. In addition, the Supply System attended a meeting with the NRC/MEB on September 30 - October 1, 1981 and discussed these surveillance requirements (Ref. Question #49 of the meeting minutes and SER page A-12). The minutes document our exception to the surveillance requirements. Drywell entry to perform this surveillance will require drywell purging. As a result, the 90 hour limit on purging the drywell through the SGT system (LCO 3.6.1.8) will, in all likelihood, be exceeded if paragraph b. remains.

o Pages 3/4 6-22 and 6-31

ANSI N271-1976, Containment Isolation Provisions for Fluid Systems, which is referenced by Regulatory Guide 1.141, uses these values (12"/minute for Gates, 4"/minute for Globes) for valves 3½" to 12" in diameter. For valves 3" in diameter or less, ANSI-N271 valve closure times normally provided by standard commercial valve operators are adequate to limit as low as reasonably attainable the release of radioactivity from the containment.

The rationale behind this statement is reasonable. Release of contaminants from failed fuel post-LOCA does not occur mechanistically until something on the order of a minute. For a design basis accident, fuel uncover does not occur for approximately 30 seconds (Ref. FSAR Figure 6.2-21a). Peak clad temperatures do not occur for approximately 120 seconds (Ref. FSAR Figure 6.3-23). A basis for accepting containment isolation valve closure times up to one minute is that core inventory due to failed fuel is not present within that time interval. Therefore, valve closure times up to about one minute are considered adequate for containment isolation purposes. Since the valves indicated on Table 3.6.3-1 are 1" valves, the Maximum Isolation Time for those valves should be changed to 15 seconds.

THE UNITED STATES OF AMERICA

IN SENATE

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LCO 3/4.8.1, A. C. Sources, was revised by NRR/PSB to require a diesel engine prelube or warmup period prior to conducting the monthly surveillance tests. Of the three diesels at WNP-2, only the DG #3 design provides the capability to operate at a reduced speed for engine warmup. A modification to the speed control circuitry and a test procedure revision would be required to afford DG #1 and #2 the same capability. The present LCO format can be adhered to but it should be noted that during the warmup period, the diesel is not in a standby status and will, therefore, not automatically respond to a LOCA signal as required by RG 1.108, paragraph C.2.a.8. The period of time required for an adequate warmup is dependant on various parameters (i.e., standby service water temperature, fuel oil characteristics, plant personnel performance time, etc.), but is conservatively estimated to take one hour per unit. LCO 3/4.8.1 action statements provide four (4) hours to complete the operability surveillance and can be relied upon to require only a declaration of inoperability of the unit being tested since the unit can be warmed up and returned to standby in less than four (4) hours. Surveillance testing would then continue in standby and with a prelubed diesel engine. The increase in diesel reliability due to minimizing the harmful effects caused by cold starts is a significant improvement in the LCO.

The note referred to in paragraphs 4.8.1.1.2.a.4 and 5, however, requires performance of a prelube period prior to testing. This requirement may compromise plant safety if surveillance testing is required on a diesel generator due to another diesel generator being inoperative. Conduct of the prelube period would then increase the number of emergency power supplies in an inoperable condition. It may, therefore, be preferable to perform a cold start test to retain the unit being tested in the standby mode. This flexibility could be provided if the note read "may be preceded by an engine prelube period" versus "shall be". The Supply System, therefore, requests that this change to LCO 3/4.8.1 be considered. There is an inherent problem with making technical specifications overly prescriptive because it is impractical to address all possible situations. It is because of this need for flexibility that only the note in the LCO need be changed.

o Page 3/4 8-18

Clarification. Distribution panel DP-S1-1F is the Division 1 125 - VDC critical switch gear distribution panel and DP-S1-1D is the Division 1 remote shutdown distribution panel. The technical specification should be changed to reflect this clarification.

A. Schwencer
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REQUEST FOR LICENSE

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To be operable by the OPERABLE definition in the technical specification, an SRM channel must have all attendant functions operable which include visual indication and an alarm function. As presently stated, without change, the technical specification is redundant. Additionally, an "audible indication" is currently required and has been interpreted by an NRC Region V inspector to require the type of audible indication employed by PWR vendors. An audible indication of SRM operating levels is not a standard BWR design. The present design alarms only to alert operators of increasing levels. The attached revised technical specification change clarifies the current technical specification.

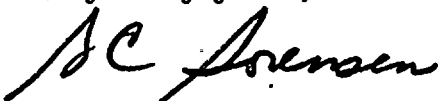
o Page 6-7

The Nuclear Safety Evaluation Group as described in the FSAR Appendix B response to NUREG 0737 item I.B.1.2 allowed members to meet ANSI qualifications as indicated in the attached draft Technical Specification. This position was accepted in NUREG 0892, Safety Evaluation Report for WNP-2 dated March 1982, pages 13-22 and 13-23. The Technical Specifications should reflect the position as accepted in the Safety Evaluation Report.

Per 10 CFR 50.92, the Supply System has reviewed these changes and considers them to involve no significant hazard. Additionally, the Supply System has evaluated this request in accordance with the criteria in 10 CFR 170.22 and has determined this request to be a Class II request involving several administrative changes of the Class II type. Accordingly, a check for one thousand, two hundred dollars (\$1,200) is enclosed in payment for this license amendment.

Should you have any questions with regard to this request, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP/MRW/tmh
Attachments

cc: R Auluck - NRC
WS Chin - BPA
D Hoffman - NRC
AD Toth - NRC Site

STATE OF WASHINGTON)
)
County of Benton)

Nuclear Project No. 2
Operating License NPF-21
Subject: *Request for License Amendment*

I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE 17 JAN., 1984

G. C. Sorensen
G. C. Sorensen, Manager
Regulatory Programs

On this day personally appeared before me G. C. SORENSEN to me known to be the individual who executed the foregoing instrument and acknowledge that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 17 day of January, 1984.

A. R. Martin
Notary Public in and for the
State of Washington

Residing at *Richland, WA*



STATE OF WASHINGTON
County of Benton

Subject:

I, C. C. SORESENSEN, being duly sworn, subscribe to and say that I am the
Manager, Regulatory Program, for the WASHINGTON PUBLIC POWER SUPPLY
SYSTEM; the applicant herein; that I have full authority to execute this
oath; that I have reviewed the foregoing; and that to the best of my
knowledge, information and belief the statements made in it are true.

DATE _____, 1986

C. C. SORESENSEN, Manager
Regulatory Program

On this day personally appeared before me C. C. SORESENSEN to be known to
be the individual who executed the foregoing instrument and acknowledged
that he signed the same as his free act and deed for the uses and
purposes therein mentioned.

GIVEN under my hand and seal this _____ day of _____, 1986.

Notary Public in and for the
State of Washington

Residing at _____

