

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8403090236 DOC. DATE: 84/03/01 NOTARIZED: YES DOCKET # 05000397  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe  
 AUTH. NAME: AUTHOR AFFILIATION  
 SORESEN, G.C. Washington Public Power Supply System  
 RECIP. NAME: RECIPIENT AFFILIATION  
 SCHWENCER, A. Licensing Branch 2

SUBJECT: Application for amend to License NPF-21, revising License  
 Condition 13 re post-accident sampling. Class II amend fee  
 encl.

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 TITLE: Licensing Submittal: PSAR/FSAR Amdts & Related Correspondence

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The following information was obtained from the records of the  
 Department of the Interior, Bureau of Land Management, dated  
 January 1, 1964, regarding the status of the various  
 land parcels in the area of the proposed project.

The information is being furnished to you for your information and  
 is not intended to constitute a recommendation or approval of the  
 project.

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 is not intended to constitute a recommendation or approval of the  
 project.

## Washington Public Power Supply System

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

March 1, 1984  
G02-84-106

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 PLANT NO. 2  
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT

- References:
- 1) Letter, G02-83-918, G. C. Sorensen (SS) to A. Schwencer (NRC), "Post Accident Sampling and Analysis of Dissolved Gases", dated October 13, 1983
  - 2) Letter, G02-84-035, G. C. Sorensen (SS) to A. Schwencer (NRC), "Schedule of Completion of Preoperational and Acceptance Tests Before Exceeding Five Percent Power", dated January 17, 1984
  - 3) Letter, MFN-006-84, G. G. Sherwood (GE) to D. G. Eisenhut (NRC), "Accuracy of Dissolved Gas Measurement for GE Post-Accident Sampling System (PASS)", dated January 18, 1984
  - 4) Federal Register (FR), April 6, 1983, pages 14864-14880, "Standards for Determining Whether License Amendments Involve No Significant Hazards Considerations"

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, Washington Public Power Supply System (WPPSS) hereby requests revision to licensing condition (13), Post Accident Sampling, of the subject license.

The Supply System has reviewed the requested revision per 10 CFR 50.59 and 50.92 and considers that no significant hazard or unreviewed safety question will result from the revision. A 50.92 analyses is provided.

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The proposed change will not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated; or
- 2) create the possibility of a new or different kind of accident from any accident previously evaluated; or
- 3) involve a significant reduction in a margin of safety.

It is requested that licensing condition (13) be changed to read as follows:

"Prior to exceeding five (5) percent of rated thermal power, the licensee shall install, test, and have operable the Post Accident Sampling System, with the exception that the installation, testing and operability of the portion of the Post Accident Sampling System associated with the dissolved gas analysis be complete prior to Commercial Operation."

Presently the ability to perform a dissolved gas analysis is a generic BWR concern. The Supply System is a participant in the GE BWR Owners Group working to resolve this issue with the NRC. Reference 1 provided the staff an interim procedure for performing the analysis and noted that a PASS modification necessary to support a final dissolved gas analysis procedure was contingent upon receipt of modification equipment from GE by November 30, 1983. Equipment was expected to be installed, tested, and operational by February 1, 1984. Reference 2 notified the staff that the PASS was expected to be operational by March 1, 1984. Reference 2 anticipated a delivery date of the modification package such that the March 1 schedule could be maintained. Concurrently, GE and the NRC staff met and determined tentative accuracy requirements for the dissolved gas analysis (Reference 3). The accuracy requirements reduce the original modification package costs and installation. Due to these changes to the original package, GE has informed the Supply System that the reduced package will not be shipped until March 9, 1984. Presently, the Supply System expects to be ready to exceed 5% power sometime near the end of March, 1984. With delivery of the GE modification package delayed, it is evident that the dissolved gas analysis capability will not support removing the existing PASS licensing condition and allowing power ascension.

An intensive effort is now being made to complete the PASS. The system is currently in a construction and troubleshooting phase. With the exception of additional trace heating identified during a recent I&E visit (approximately 10% more trace heating than original design) the PASS is expected to meet the March 1, 1984 schedule. In order to demonstrate the dissolved gas capability with the interim procedure, various volume measurements must be taken on the PASS. Additionally, training with the interim procedure must be conducted. Both of these activities must be done upon system completion. With the imminent delivery of the final modification package, the Supply System

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and the results of the survey.

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considers that both of these activities on a PASS without the modification would be nonproductive. Competency with the interim procedure analysis would be meaningless upon arrival and installation of the final package. After installation the required training and procedure modifications would need to be completed before final competency could be demonstrated.

The Supply System considers that this request does not involve a significant hazard. The meeting discussed in Reference 3 demonstrated that the dissolved gas analysis input to determining core degradation in a BWR was not a significant contribution. Additionally, in reviewing Reference 4 this request does not meet the criteria for consideration as a significant hazard.

In determining operability it is noted that the NRC criteria for post-accident sampling requires that 3 hours or less be allotted to complete sampling and analysis once the decision to sample is made. The Supply System considers this criteria to be attainable given certain activities considered prudent practice during an accident scenario be completed prior to making a decision to sample. These activities include:

1. Assembling chemistry personnel with implementation of health physics requirements including anti-contaminant clothing and personnel dosimetry.
2. Dispatching personnel to the PASS Sample Laboratory employing post-accident precautions and ALARA considerations.
3. Conducting health physics survey of the PASS Sample Laboratory.
4. Verifying a safe atmosphere in the PASS Sample Laboratory.
5. Energizing and verifying the PASS status.
6. Selecting by procedure, the initial sample point and sample media.

Further, the Supply System does not consider it necessary to have personnel qualified to operate PASS on shift at all times. The PASS is not a system to be immediately utilized. The accident scenario and necessity to sample develops over a period of hours. A PASS sample cannot be taken until the dynamics of an accident stabilize. If the reactor chemistry has not stabilized, an accurate analysis of core conditions will not be obtained from a PASS sample. During this stabilizing time, operators are not without other indications to determine the plant status. Regulatory Guide 1.97 and other TMI requirements ensure the survival of necessary instrumentation and the training necessary to utilize the instruments. As a result, an immediate on-shift PASS sample capability is not necessary. The Supply System considers at least 4 hours are required to ensure adequate preparation prior to sampling and analysis. This time interval will allow a prudent and realistic approach to proving the PASS capability.

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products.

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education of the population.

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describes the political situation  
of the country and the  
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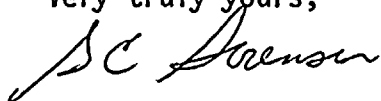
A. Schwencer  
Page Four  
March 1, 1984

The Supply System has evaluated this request in accordance with the criteria in 10 CFR 170.22 and determined this request to be a Class II request. Accordingly, a check for one thousand two hundred dollars (\$1,200)- is enclosed in payment for this license amendment.

In accordance with 10 CFR 50.91, the State of Washington has been provided a copy of this letter.

Your prompt consideration of this change is requested so that the present power ascension program can proceed without impact due to this generic concern. Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

PLP/tmh  
Attachment

cc: R Auluck - NRC  
WS Chin - BPA  
N Lewis - EFSEC  
AD Toth - NRC Site

STATE OF WASHINGTON     )  
                                  )  
County of Benton         )

Subject: WNP-2 Operating License NPF-21  
Request for 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 1 MARCH, 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 1 day of March, 1984.

S. R. Michaels  
Notary Public in and for the  
State of Washington

Residing at Richland, wa.  
Dec. 85



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