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 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, changing Tech Specs to allow suspension of containment inerting during power ascension test program until rated thermal power trip tests completed. Fee encl.

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The following information was obtained from the records of the Department of the Interior, Bureau of Land Management, for the year 1964:

The total number of acres of land in the State of Alaska, as of January 1, 1964, was 3,800,000 acres.

The following table shows the distribution of land in the State of Alaska, by type of land, as of January 1, 1964:

Federal Land		State Land		Private Land		Total	
Acres	Percentage	Acres	Percentage	Acres	Percentage	Acres	Percentage
1,200,000	31.6%	1,500,000	39.5%	1,100,000	28.9%	3,800,000	100.0%
1,000,000	26.3%	1,300,000	34.2%	900,000	23.7%	3,200,000	84.2%
800,000	21.1%	1,100,000	28.9%	700,000	18.4%	2,600,000	68.4%
600,000	15.8%	900,000	23.7%	500,000	13.2%	2,000,000	52.6%
400,000	10.5%	700,000	18.4%	300,000	7.9%	1,400,000	36.8%
200,000	5.3%	400,000	10.5%	100,000	2.6%	700,000	18.4%
100,000	2.6%	200,000	5.3%	50,000	1.3%	350,000	9.2%
50,000	1.3%	100,000	2.6%	25,000	0.7%	175,000	4.6%
25,000	0.7%	50,000	1.3%	12,500	0.3%	87,500	2.3%
12,500	0.3%	25,000	0.7%	6,250	0.2%	43,750	1.1%
6,250	0.2%	12,500	0.3%	3,125	0.1%	21,875	0.6%
3,125	0.1%	6,250	0.2%	1,562	0.0%	10,937	0.3%
1,562	0.0%	3,125	0.1%	781	0.0%	5,469	0.1%
781	0.0%	1,562	0.0%	390	0.0%	2,734	0.0%
390	0.0%	781	0.0%	195	0.0%	1,366	0.0%
195	0.0%	390	0.0%	97	0.0%	683	0.0%
97	0.0%	195	0.0%	48	0.0%	340	0.0%
48	0.0%	97	0.0%	24	0.0%	170	0.0%
24	0.0%	48	0.0%	12	0.0%	85	0.0%
12	0.0%	24	0.0%	6	0.0%	42	0.0%
6	0.0%	12	0.0%	3	0.0%	21	0.0%
3	0.0%	6	0.0%	1	0.0%	10	0.0%
1	0.0%	3	0.0%	0	0.0%	4	0.0%
0	0.0%	1	0.0%	0	0.0%	2	0.0%
0	0.0%	0	0.0%	0	0.0%	1	0.0%
0	0.0%	0	0.0%	0	0.0%	0	0.0%

## Washington Public Power Supply System

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

May 11, 1984  
G02-84-298

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, SPECIAL TEST EXCEPTION  
3/4.10.5, OXYGEN CONCENTRATION

- References:
- 1) Letter, G02-83-900, G. C. Sorensen (SS) to A. Schwencer (NRC), "Exemption Request to NUREG-0123, Standard BWR Technical Specifications", dated October 10, 1983
  - 2) Letter, T. M. Novak (NRC) to G. C. Sorensen (SS), "WPPSS Nuclear Project No. 2 - Request for Exemption From 10 CFR 50.44 Regarding Containment Inerting", dated December 15, 1983
  - 3) Title 10, Code of Federal Regulations, Part 50.44, Standards for Combustible Gas Control System in Light Water Cooled Power Reactors
  - 4) Federal Register (FR), April 6, 1983, pages 14864-14880, Standards for Determining Whether License Amendments Involve No Significant Hazards Considerations

Reference 1 requested the subject technical specification allow 120 Effective Full Power days prior to requiring containment inerting instead of the presently worded technical specification: "6 months after initial criticality". Reference 2 denied that request but did commit to consider a new request if two-to-three months after initial criticality it was determined that the power ascension test program (PATP) could not be completed within six months.

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Rec'd 4/11/84 11:00

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With WNP-2 achieving initial criticality January 19, 1984, the present technical specification would require inerting by July 19, 1984. Continuation of the PATP beyond this date with an inerted containment and the high frequency of containment entries requiring deinerting would severely impact the present schedule and significantly delay commercial operations. Information provided by reference 1 indicated that the average PATP period for the last nine (9) domestic BWR startups, excluding LaSalle 1, was 330 days. The program for Susquehanna 1 took 254 days and LaSalle 1, 568. Due to the reasons identified below, the present projected completion for WNP-2 is September 6, 1984. This date has no contingency "cushion" and contains no allowances for unscheduled equipment repairs or required retesting.

Accordingly, the Supply System hereby requests the subject technical specification be changed (as attached) to allow suspension of containment inerting during the power ascension test program until either the required 100% of Rated Thermal Power Trip Tests have been completed or the reactor has operated for 120 Effective Full Power Days.

It should be noted that this technical specification change request also represents a request for exemption from reference 4, paragraph (c)(3)(i) which states: "Effective May 4, 1982 or 6 months after initial criticality, whichever is later, an inerted atmosphere shall be provided for each boiling water nuclear power reactor with a Mark I or Mark II type containment...".

The reason the WNP-2 PATP is being extended beyond six (6) months is the amount of plant testing accomplished between fuel load and five percent (5%) power. In order to expedite moving from a construction phase to the power ascension program, the Supply System chose to defer a significant amount of system testing normally done prior to fuel load. This is reflected in the list of preoperational and acceptance tests in attachment 1 to the WNP-2 operating license. The overall affect of deferral on scheduling was beneficial; however, it did move more work and plant evolutions into the six (6) month period thereby extending that interval.

The Supply System has reviewed the technical specification change per 10 CFR 50.59 and 50.92 and considers that no significant hazards or unreviewed safety questions will result from the change.

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.



A. Schwencer  
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With regard to 10 CFR 50.92, the Supply System has determined that this change does not involve a significant hazards consideration. It has been a long established NRC staff policy to permit the operation of boiling water plants during start-up testing with non-inerted containments. The high frequency of containment entries during this period of plant operations make it impractical to operate with an inerted containment. This matter has been reviewed and found acceptable by the staff in a number of prior cases. The staff has found that exemption from 10 CFR 50.44 can be granted and does not endanger life or property or the common defense and security and is otherwise in the public interest. (See LaSalle Unit 1 Operating License NPF-11, Amendment No. 12, and supporting SER, dated December 20, 1982).

Additionally, the staff has previously determined that similar technical specification amendments and exemptions to 10 CFR 50.44 do not authorize a change in effluent types of total amount nor an increase in power level and would not result in any significant environmental impact. Further, the staff has concluded that similar amendments and exemptions involve actions which are insignificant from the standpoint of environmental impact.

Hence, the Supply System concludes that this change does not involve a significant hazards consideration and cites example (vi) of reference 4 in justification.

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 III request, having acceptability clearly identified by an NRC position and deemed not to involve a significant hazards consideration. Accordingly, a check for Four thousand dollars (\$4,000) 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. 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  
ND Lewis - EFSEC  
D Hoffman - NRC  
AD Toth - NRC Site