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 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 Tech Specs
 3.6.1.3 & 4.6.1.3 re primary containment airlocks &
 Surveillance requirements, respectively. Fee paid.

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FRANK F. GREEN	LIEUTENANT	1914	...
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 RICHARD R. YOUNG

Washington Public Power Supply System

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

December 20, 1984
G02-84-652

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
TO TECHNICAL SPECIFICATIONS FOR PRIMARY CONTAINMENT
AIR LOCKS (3.6.1.3 AND 4.6.1.3)

References: 1) Letter to D. F. Kirsch (NRC Region V) from G. C. Sorensen (SS), Same Subject, dated November 21, 1984 (G02-84-614)
2) Letter to G. C. Sorensen (SS) from D. F. Kirsch (NRC Region V), "NRC Inspection 84-31", dated December 10, 1984

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby requests an amendment to the subject Technical Specifications. Specifically, the Supply System is seeking to clarify the Technical Specifications for Primary Containment Air Locks, LCO 3.6.1.3, and the attendant Surveillance Requirements 4.6.1.3. The specific change requested is contained in the marked-up pages 3/4 6-5 and 3/4 6-6, attached.

This amendment is being requested in order to clarify the Technical Specifications to permit repair and/or maintenance of the interlock mechanism during plant operations through the implementation of administrative controls. These controls are intended to assure containment integrity in the event the containment airlock itself is operable, but the interlock mechanism is inoperable. This has been an area of continued discussion with I&E Region V for some time (Reference 1), with the mutual agreement as described in Reference 2 that "this is a matter of little safety significance, but rather the formality and somewhat ambiguity of the Technical Specification (license) requirement." (sic)

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A. Schwencer

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS FOR PRIMARY
CONTAINMENT AIR LOCKS

Such a clarification is appropriate and acceptable because:

- 1) The intent of the Technical Specifications is to provide a boundary for uncontrolled releases to the secondary containment during accident conditions. The attached clarification does not alter this intent.
- 2) Personnel access is allowed provided both air lock doors are not opened simultaneously.
- 3) Although the surveillance requirements include verification of the door interlock mechanism, neither action statement adequately addresses the follow-up action required for an inoperative interlock (as opposed to the airlock itself).

There is ample precedent established to allow administrative controls for safety-related systems. The action statement for 3.7.7, Fire-Rated Assemblies, provides for administrative controls (posting of fire watches); as does 3.1.4.1, Rod Worth Minimizer (manual verification) and 3.3.7.12, Radioactive Gaseous Effluent Monitoring Instrumentation (grab samples).

The Supply System has reviewed the requested amendment per 10 CFR 50.59 and 50.92 and has determined that no unreviewed safety question or no significant hazard will result. Further, 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.

The Supply System has evaluated this request in accordance with the criteria in 10 CFR 170.21, and has included a warrant for one hundred fifty dollars (\$150.00) as initial payment for this application for amendment under Facility Category A (Power Reactors).



A. Schwencer

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS FOR PRIMARY
CONTAINMENT AIR LOCKS

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

HLA/tmh
Attachments

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



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STATE OF WASHINGTON)
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County of Benton)

WNP-2, OL NPF-21, Request for
Amendment to Tech. Specs. For Primary
Subject: Containment Air Locks (3.6.1.3 & 4.6.1.3)

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 19 Dec, 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 19th day of December, 1984.

Kathryn H. DuBois
Notary Public in and for the
State of Washington

Residing at Richland, wa
March 1989

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