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ACCESSION NBR: 8501240208 DOC. DATE: 85/01/17 NOTARIZED: YES DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Application to amend License NPF-21, extending required date for 30 days to replace electrical equipment. Amend due to design changes, delays in procurement, test complications & installation problems. Fee paid.

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 TITLE: OR/Licensing Submittal: Equipment Qualification

NOTES:

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Washington Public Power Supply System

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

January 17, 1985
G02-85-021

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 LICENSE CONDITION (28) AND
ENVIRONMENTAL QUALIFICATION 10 CFR 50.49(h)
NOTIFICATION

Reference: Letter, G02-83-842, G. C. Sorensen (SS) to A.
Schwencer (NRC), "Environmental Qualification
Report for Safety Related Equipment, September
1983", dated September 16, 1983

The subject license condition requires the Supply System to environmentally qualify all electrical equipment according to the provisions of 10 CFR 50.49 prior to March 31, 1985. In order to satisfy this condition, the equipment identified in Attachment 1 must be replaced. This will require plant shut-down while systems are removed from service for component replacement.

The Supply System has determined that due to recent design changes, delays in procurement, test complications, and installation problems, we must request an extension for thirty (30) days from the required date for the items identified in Attachment 1. Accordingly, in accordance with the Code of Federal Regulations; Parts 50.90 and 2.101, the Supply System requests that the subject license condition be amended to read as follows:

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REQUEST FOR AMENDMENT TO LICENSE CONDITION (28) AND
ENVIRONMENTAL QUALIFICATION 10 CFR 50.49(h) NOTIFICATION

"Prior to March 31, 1985, the licensee shall environmentally qualify all electrical equipment according to the provisions of 10 CFR 50.49 with exception of the equipment listed below, which shall be qualified on or before April 30, 1985."

MS-LITS-26A
MS-LITS-26B
MS-LITS-26C
MS-LITS-26D
REA-E/P-1A
REA-E/P-1B

PSR-V-X77A/1
PSR-V-X77A/3
RRA-RMS-FN/1
RRA-RMS-FN/2
RRA-RMS-FN/3
LPCS-PIS-1

The Supply System has reviewed this change per 10 CFR 50.59 and determined that no unreviewed safety questions will result from this extension.

The Supply System has reviewed this change per 10 CFR 50.92 and determined that it does not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated because (a) overall equipment qualification requirements applicable to WNP-2 are themselves more stringent than similar requirements applicable to plants licensed to operate prior to February 22, 1983 and (b) given the overall requirements governing the operation of WNP-2, the requested amendment does not constitute a significant change to the licensing basis of the plant; or
- 2) create the possibility of a new or different kind of accident from any accident previously evaluated because no changes are being made to any equipment and/or systems, and therefore no new or different kinds of accidents would be made possible; or
- 3) involve a significant reduction in a margin of safety because no original design parameters are being reduced.

This amendment is being requested in the spirit of the extension for environmental qualification under which the industry operates. Namely, deferral is technically justified and allows utilities the opportunity to install qualified equipment on a reasonable schedule with minimal impact to resources. Such an extension would also coincide with our presently scheduled outage of mid to late April, 1985. WNP-2, through agreements with Bonneville Power Administration (BPA), must schedule our planned outages to coincide with the peak river flow and hydro generation in the Pacific Northwest. This extension would accommodate BPA's request and be in the public interest.

A. Schwencer
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REQUEST FOR AMENDMENT TO LICENSE CONDITION (28) AND ENVIRONMENTAL
QUALIFICATION 10 CFR 50.49(h) NOTIFICATION

The Supply System would also like to take this opportunity to advise you of another matter concerning environmental qualification related to high energy line break analysis (i.e. RWCU and RCIC lines, Refer to Licensee Event Report 85-001). We are presently undertaking an independent assessment of the appropriateness of the stroke times of the valves identified in Attachment 2. These valves are presently identified on Table B of the Justification for Interim Operation (JIO) as being qualified. We expect this study to be completed in 6 to 8 weeks. Until this study is completed, we have insufficient basis upon which to conclude that an application for a license amendment is necessary. If the results indicate that a change is necessary in order to satisfy qualification design criteria, an emergency license condition amendment will be requested prior to March 31, 1985. If a change is necessitated, we plan to block the valves to reduce the stroke times during the next scheduled outage, and procure the replacement parts on an expedited basis.

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).

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

This letter also provides notification per 10 CFR 50.49(h).

Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing. As you are aware, prompt attention to this amendment is necessary; continued operation of WNP-2 requires approval of this amendment no later than March 31, 1985.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh
Attachments

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

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Attachment 1

Equipment Proposed for Replacement by
April 30, 1985 for Environmental Qualification

<u>EPN</u>	<u>Description</u>	<u>Replacement Equipment</u>
MS-LITS-26A -26B -26C -26D	Level Transmitter	Rosemount 1153 Static O Ring D05PA
PSR-V-X77A/1 -X77A/3	Solenoid Valve	Upgrade Kit
RRA-RMS-FN/1 -FN/2 -FN/3	Remote Manual Switch	Electroswitch
REA-E/P-1A -1B	Electro/Pneumatic Converters	ITT Conoflow
LPCS-PIS-1	Pressure Switch	Static O Ring



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Attachment 2

Equipment Presently Being Evaluated

<u>EPN</u>	<u>Description</u>	<u>Modification</u>
RCIC-MO-V/63	Motor Operator	Block Valve Travel Partially Closed Until Replacement Parts Available
RWCU-MO-V/1	Motor Operator	Block Valve Travel Partially Closed Until Replacement Parts Available

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STATE OF WASHINGTON)
)
County of Benton)

Subject: WNP-2 OL NPF-21, Request for
Amendment to Licensing Condition
(28) & Environmental Qualification
10CFR50.49(h) Notification

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, 1985

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 17th day of January, 1985.

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

Residing at

Richland, wa
March 1989

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1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the problem and the objectives of the research.

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