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SUBJECT: Requests exemption from reporting future ESF actuations resulting from chlorine monitor tape depletion or spurious reactor water cleanup high delta flow, per 10CFR50.73(f). Justification for exemption provided.

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Washington Public Power Supply System

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February 20, 1985
G02-85-093

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, LICENSEE
EVENT REPORT EXEMPTION REQUEST

References: a) 10CFR50.73, Licensee Event Report System,
Paragraph (f), Exemptions
b) Licensee Event Reports: 84-035; -057;
84-072-00, -01, -02; 84-093, -097, -101,
-119 & -128

The current Licensee Event Report (LER) rule as contained in 10CFR50.73 was initiated in 1984 to identify the types of reactor events and problems that are believed to be significant and useful to the NRC in its efforts to identify and resolve threats to public safety. With this in mind, the rule was designed to provide the information necessary for engineering, trend and pattern analysis of operational occurrences. During development of this rule, it was the Commission's stated intent that the NRC should continue to seek methods and systems improvements to maximize the value of operational data.

The Supply System's Washington Nuclear Plant - Unit 2 (WNP-2) has submitted approximately seven (7) LER's associated with Reactor Water Cleanup (RWC) spurious high delta flow isolations and three (3) LER's which described unplanned Control Room Emergency Filtration System automatic starts due to chlorine monitor tape depletion. Each of these events was reported under 50.73(a)(2)(iv) which requires reporting of any event or condition which results in a non-planned manual or automatic actuation of an Engineered Safeguards Feature (ESF). These occurrences were actuations of an ESF as defined by the WNP-2 FSAR.

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LICENSEE EVENT REPORT EXEMPTION REQUEST

The LER rule, as presently written, allows for exemptions to the reporting requirements when adequate justification is provided. The Supply System believes these two types of events qualify for exemption for the following reasons:

A. Chlorine Detector Tape Depletion

1. Chlorine monitor tape depletion is a function of the number of maintenance activities performed and tape depletion is not readily apparent to each successive technician. In an effort to preclude recurrence of these automatic initiations, tape replacement has been reduced to five days from an eight day supplied length. Even this action can not guarantee that no future actuations occur.
2. The chlorine detection monitors ensure that any accidental release of chlorine is detected and protective actions automatically taken to provide for protection of control room personnel. The depletion of chlorine monitor tape results in initiation of the same automatic actions without any detectable chlorine concentration present. Tape depletion can not prevent initiation of the required safety actions when chlorine is present.

B. RWCU System High Delta Flow Isolations

1. The spurious high delta flow isolations primarily occur during heatup and cooldown due to instrument errors resulting from a lack of temperature compensation. Plant corrective actions have reduced the frequency of these occurrences but can not preclude future spurious isolations.
2. The RWCU high delta flow isolation is provided to mitigate the effect of an RWCU line break by isolating the Reactor vessel from the break. This function is not degraded by the circumstances surrounding these spurious trips. In fact, the isolation is the result of a more conservative system response to existing conditions (i.e., non-temperature compensated instrumentation results in high delta flow isolation well before an actual flow mismatch limit is reached.)
3. Spurious RWCU high delta flow isolations have been shown to be a generic problem with similar type plants.

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The Supply System has reviewed the circumstances surrounding both types of events and determined that no threat to public safety exists. Additionally, the LER's describing these events provide no information which would be of use in evaluating significant operating occurrences, since these occurrences are basically non-events.

Pursuant to the above information, and in accordance with 10CFR50.73(f), the Supply System hereby requests exemption from reporting future ESF actuations resulting from chlorine monitor tape depletion or spurious RWCU high delta flow. Should you have any questions with regard to this exemption request please contact either Mr. P. L. Powell, Manager, WNP-2 Licensing at (509) 377-2501 Ext. 2298 or Mr. D. Koenigs, WNP-2 Compliance Engineer at Ext. 2279.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

RLK/tmh

cc: R Auluck - NRC
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