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RECIP.NAME RECIPIENT AFFILIATION
SCHWENCER,A. Licensing Branch 2

SUBJECT: Application for amend to License NPF-21,revising Tech Spec Tables 3.3.3-1,3.3.3-2 & 4.3.3.1-1 re HPCS pump discharge pressure high signal.High discharge signal will be replaced w/pump breaker running input.Fee paid.

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February 27, 1985
G02-85-098

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 HPCS PUMP DISCHARGE PRESSURE - HIGH SIGNAL (TABLES 3.3.3-1, 3.3.3-2, AND 4.3.3.1-1)

In accordance with the Code of Federal Regulations (CFR), Title 10, Parts 50.90 and 2.101, the Supply System hereby requests an amendment to the subject Technical Specifications.

The Technical Specifications as presently written (see attached pages) contain the requirement to perform a monthly Channel Functional Test and an annual (during refueling outage) Channel Calibration on the Pump Discharge Pressure-High (pump running) instrumentation. The present HPCS design incorporates minimum flow valve logic based on concurrent conditions of high pump discharge pressure and low system flow. The pressure switch which provides the high discharge pressure (pump running) input takes its signal downstream of the pump discharge check valve. Consequently, upon securing the pump following closure of the test flow path, high pressure can be trapped downstream of the check valve and result in the minimum flow valve remaining open with the pump off. This necessitates depressurizing the system to close the valve.

This amendment seeks to replace the high discharge signal with a pump running input taken from the pump breaker. Thus, the valve would open on low flow and breaker closed (pump running) and would close on high flow or with the breaker open. With this design enhancement, the pump discharge pressure-high signal would no longer be used or needed.

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The Supply System has determined that the deletion of the signal surveillance from the Technical Specifications and non-reinsertion of the verification of breaker performance will not result in any decreased safety significance or system reliability. This is due to the fact that this action eliminates drift and calibration errors associated with instrumentation and their attendant failure modes. Actuation of the system itself is being made even more affirmative from the standpoint of signal reliability; that is, the proposed pump logic is a positive indication of the pump breaker position and will automatically reflect the status of the HPCS pump without any of the problems associated with instrument channels. Furthermore, the pump minimum flow logic will be functionally verified during the HPCS Pump Quarterly Operability Test as well as during the 18 month Logic System Functional Test.

The Supply System has reviewed this change per 10CFR50.59 and determined that no unreviewed safety questions will result from this amendment.

The Supply System has reviewed this change per 10CFR50.92 and determined that it does not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated because replacing an instrument signal with a non-instrumented signal does not degrade the HPCS system's ability to perform following an accident nor does it degrade the system pressure boundary; or

2) Create the possibility of a new or different kind of accident than previously evaluated because the post accident ECCS function of the system will not be affected; or

3) Involve a significant reduction in a margin of safety because the proposed change will have no effect on the ability of the HPCS system to meet its associated ECCS injection functions.

The Supply System has evaluated this request in accordance with the criteria contained in 10CFR170.21, 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 10CFR50.91, the State of Washington has been provided a copy of this letter.

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS FOR HPCS PUMP DISCHARGE PRESSURE-HIGH SIGNAL

The Supply System would like to make this modification during the M3 Outage, presently scheduled to begin April 15, 1985, and expected to have a duration of approximately 60 days. This would require NRC approval to be accomplished no later than May 15, 1985, but preferably May 1 in order to allow for a two week early startup. 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
C Eschels - EFSEC
JB Martin - NRC RV
AD Toth - NRC Site
E. Revell - BPA