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SUBJECT: Application for amend to License NPF-21, authorizing relief
 for one time only from Tech Spec 4.4.3.2-1 requirement of
 leak testing of RCS Pressure Isolation Valves RCIC-V-66,
 RCIC-V-13 & RHR-V-23.

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Washington Public Power Supply System

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March 14, 1985
G02-85-137

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 REACTOR COOLANT SYSTEM PRESSURE
ISOLATION VALVES (TABLE 3.4.3.2-1)

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 requesting relief for one time only, from the Technical Specification surveillance requirement 4.4.3.2-1, of leak testing three Reactor Coolant System Pressure Isolation valves, RCIC-V-66, RCIC-V-13 and RHR-V-23.

The intent of the subject Technical Specification was that these valves be demonstrated operable by leak testing on an 18 month cycle to coincide with a normal refueling cycle. These specific valves as indicated in the proposed Technical Specification change require containment head removal or access into the more hazardous areas of containment for accessibility and testing purposes. The Supply System proposes to leak test these valves during the first scheduled refueling outage which would allow for easy access because the valves will be accessible due to refueling arrangements (shield plug and containment head removal). Such a schedule would also minimize personnel risk and minimize the impact on present outage schedules and critical resources.

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FOR REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES
(TABLE 3.4.2-1)

Based on an 18 month schedule as specified in the Technical Specifications, these leak tests would be performed prior to June 20, 1985. However, due to the surplus power from hydroelectric generation in the Pacific Northwest from spring runoff and to maximize resources, the Bonneville Power Administration (BPA) has directed that the Supply System be on a 12 month scheduled refueling cycle to coincide with the regional surplus power.

If the Supply System intended to refuel during the spring 1985 outage, the leakage testing could be accommodated thereby satisfying the Technical Specification requirement. However, due to the Power Ascension Test Program conducted between licensing (December 20, 1983) and commercial operation (December 13, 1984) and the consequential limited amount of power generation, the Supply System considered refueling and the associated containment head removal to be unwarranted.

As a result, the spring 1985 outage will not require containment head removal. Since head removal will not be accomplished, the ability to perform these tests is impaired. Access to these valves under test condition (950 + 10 psig) exposes personnel to extreme hazards (high in the containment or in confined areas with high pressure test equipment). Furthermore, head removal must be accomplished to leak test RCIC-V-66 and is a pre-requisite for testing of RCIC-V-13 and RHR-V-23. Head removal, if required, will divert plant resources from scheduled maintenance activities and plant modifications previously determined by WNP-2 management to be essential. This will result in an extension of the spring 1985 outage beyond that desired to support the BPA and would be contrary to the public interest in the Pacific Northwest.

As proposed, this amendment would schedule leakage testing of these specific valves during the spring 1986 outage. The Supply System has determined that this schedule does not represent a significant decrease in safety or system reliability. The system design relies on these valves for protection of low pressure piping. Gross failure of these valves is unlikely, and leakage testing provides little advance indication of imminent gross valve failure. Furthermore, the system design is such that any leakage that may develop over this interval can be readily detected by existing instrumentation:

- High/low pressure interface valve leakage pressure monitors (Quality Class I) are available with an alarm in the Control Room. These monitors are surveilled by the same Technical Specification.

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FOR REACTOR COOLANT SYSTEM PRESSURE ISOLATION VALVES
(TABLE 3.4.2-1)

- Position indication on each interface valve is available in the Control Room.
- Narrow range suppression pool level indication is available which is sufficiently sensitive to detect gross system leakage since the leakage would be diverted to the suppression pool by relief valves provided for over-pressure protection.

Additionally, similar valves will be accessible and tested during the spring 1985 outage and any excessive leakage or other degraded valve conditions will be evaluated for generic applicability to these valves.

It should be noted that these valves have not required maintenance since last tested. These valves are operability tested at cold shutdown per ASME requirements and to date, evidence of leakage has not been apparent. Had the valves required maintenance, leak testing would have been accomplished at that time.

Based on these considerations, (risks due to personnel hazard; impact to the spring 1985 outage and the BPA schedule; loss of power generation; and resource allocation away from essential maintenance and plant improvement activities) the benefit to the public health and safety gained by leak testing of these valves during the spring 1985 outage as opposed to the spring 1986 outage is not apparent.

The Supply System has reviewed this change per 10CFR50.59 and determined that no unreviewed safety questions will result from this amendment. This Technical Specification change has been reviewed and approved by the WNP-2 Plant Operations Committee and the Supply System Corporate Nuclear Safety Review Board.

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

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the proposed schedule for leak testing will not increase the probability of gross valve failure. Any small leakage that could develop over this interval would not jeopardize low pressure piping. Additionally should leakage occur, the plant is instrumented to detect it and respond.
- 2) Create the possibility of a new or different kind of accident than previously evaluated because no new accident scenarios are credible based on scheduling leakage testing alone.

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- 3) Involve a significant reduction in a margin of safety because the proposed schedule for leak testing will not provide significantly less indication of a potential for gross valve failure and the plant design, to detect and provide piping protection for over-pressurization, is not diminished.

This change does not involve a significant hazards consideration. Example (vi) P 14870 of the Federal Register, April 6, 1983, is cited as justification. The 18 month schedule for leak testing allows maximum plant utilization with respect to plant refueling schedules with minimum hazard to plant personnel and minimum impact to the public interests. The proposed schedule maintains the spirit of the leakage testing intent and does not present a significant hazard.

The Supply System has evaluated this request in accordance with the criteria contained in 10CFR 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 10CFR 50.91, the State of Washington has been provided a copy of this letter.

Currently the spring 1985 outage will commence as directed by the BPA sometime during May 1 through May 15, 1985. In order to schedule activities during this outage, NRC action on this schedule change is desired no later than June 1, 1985 but preferably mid-May during the early portion of the outage to allow maximum management flexibility.

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/slr
Attachments

cc: R Auluck - NRC
WS Chin - BPA
C Eschels - EFSEC
JB Martin - NRC RV
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E Revell - BPA

