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 AUTH. NAME: SORENSEN, G. C. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: SCHWENCER, A. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Application for amend to License NPF-21, revising Tech Specs
 re Surveillance Requirement 4.6.1.1 to allow certain
 containment isolation valves to be excluded while plant
 at power, to avoid unnecessary personnel hazards. Fee paid.

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1. The first part of the report is a general statement of the purpose and scope of the study. It is followed by a brief review of the literature on the subject.

2. The second part of the report is a detailed description of the methods used in the study. This includes a description of the subjects, the experimental design, and the data collection procedures.

RESULTS

Group	Condition	Mean	Standard Deviation	Significance
1	Control	10.5	2.1	
2	Experimental	12.3	1.8	
3	Control	11.2	2.5	
4	Experimental	13.1	2.0	
5	Control	10.8	1.9	
6	Experimental	12.5	2.2	
7	Control	11.5	2.3	
8	Experimental	13.2	2.1	
9	Control	10.9	2.0	
10	Experimental	12.7	2.4	

Washington Public Power Supply System

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

April 25, 1985
G02-85-216

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 SPECIFICATION SURVEILLANCE REQUIREMENT
4.6.1.1 (PRIMARY CONTAINMENT INTEGRITY)

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 Technical Specifications. Specifically, the Supply System is requesting a change to Surveillance Requirement 4.6.1.1 (pg. 3/4 6-1 attached) which will allow certain containment isolation valves to be excluded from routine surveillance requirements while the plant is at power in order to avoid unnecessary personnel hazards from both a safety and ALARA standpoint.

During plant operations there are, and will be, areas within the plant that operate at high radiation levels and/or very high temperatures that make personnel access extremely hazardous. Some of the containment isolation valves are either located in these areas or require passing through these areas in order to perform the 31 day surveillance requirements. Entry into or through these areas creates unnecessary personnel safety hazards and/or is inconsistent with established ALARA practices. The Supply System is therefore seeking an amendment to allow us to institute certain administrative controls that are meant to ensure containment integrity, which would justify a waiver of the 31 day surveillance requirement except during periods of Cold Shutdown (CSD).

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REQUEST FOR AMENDMENT TO TECH. SPEC. SURVEILLANCE REQUIREMENT 4.6.1.1

At present, the areas where these valves are located are locked, posted as high radiation areas, and require a Radiation Work Permit (RWP) and authorization from Health Physics to access the areas on an "as needed" basis. In addition, after the valves are verified as being in the proper position, they are locked, sealed, or otherwise secured in the closed position. These administrative controls ensure containment integrity while at the same time allow the plant personnel to avoid unnecessary radiation exposure and/or personal injury due to high temperatures. This change is an extension of current Technical Specification philosophy pertaining to valves inside the primary containment.

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

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 there is no change to the valves or their positions. This change reflects only access restrictions which prevent position verification while at power; or
- 2) Create the possibility of a new or different kind of accident than previously evaluated because this is an administrative change only and does not impact system operation; or
- 3) Involve a significant reduction in a margin of safety because it does not change the leakage paths or rates assumed in the WNP-2 Final Safety Analysis Report (FSAR).

The Supply System has evaluated this request in accordance with the criteria contained 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.



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This Technical Specification change has been reviewed and approved by the WNP-2 Plant Operations Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB).

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: JO Bradfute - NRC
WS Chin - BPA
C Eschels - EFSEC
JB Martin - NRC RV
E Revell - BPA
AD Toth - NRC Site