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SORENSEN,G.C. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
BUTLER,W.R. Licensing Branch 2

SUBJECT: Application for amend to License NPF-21,changing Tech Spec surveillance requirement to demonstrate operability of suppression chamber drywell vacuum breaker pairs from once per 31 days to once per 92 days.Fee paid.

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

May 30, 1985
G02-85-278

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Mr. W. R. Butler, Chief
Licensing Branch No. 2
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Butler:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS FOR SUPPRESSION CHAMBER - DRYWELL VACUUM BREAKERS (3/4.6.4 VACUUM RELIEF)

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 WNP-2 Technical Specifications. Specifically, the Supply System is requesting that the subject technical specification requirement (including the bases) to have all nine (9) Suppression Chamber-Drywell vacuum breaker pairs operable be revised so that seven (7) pairs are required to be operable with the further condition that all nine (9) pairs be verified closed on the same frequency as presently required in the technical specifications. Revised pages 3/4 6-33, 6-34, and B 3/4 6-4 are attached. In addition, we are requesting a change in the surveillance requirement to demonstrate operability of the vacuum breaker pairs as well as both position indicators from once per 31 days to once per 92 days (also on page 3/4 6-34).

This amendment will reflect the analysis as previously reviewed and approved by the NRC in the Supply System FSAR, Chapter 6.2.1.1.4, which normally requires only seven (7) operable vacuum breaker pairs. Nine (9) pairs of Suppression Chamber-Drywell vacuum breakers have been provided which is two more than the seven (7) required for postulated post-accident conditions. The additional vacuum breaker pairs are operational spares provided so that operation may continue indefinitely with as many as two (2) pairs inoperable in the closed position. Staff review of this analysis is documented in NUREG 0892, the WNP-2 Safety Evaluation Report, Section 6.2.1.5.

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The revision to surveillance requirements stated in 4.6.4.1.b.1 and 2 is based on the WNP-2 dual disc vacuum breaker valve design versus a single disc design. The concern, as we understand it, is that SRV actuation causes the air in the tail pipe prior to actuation to be admitted into the suppression pool air space causing an increase in pressure. This increase in pressure is then postulated to have the potential for causing a slight opening of the vacuum breaker; i.e., not enough to provide a change in indication but enough to provide for a bypass leakage path. WNP-2 has a dual disc vacuum breaker valve design with actuators that provide for remote cycling. This testability design prohibits the simultaneous opening of both discs using the remote operators. This then would preclude the WNP-2 design from venting a differential pressure less than the .5 psid necessary for valve operation. The Supply System believes the test requirements pertain to containment designs that employ single disc vacuum breaker design and is, therefore, not applicable to WNP-2. The surveillance format adopted is based on an accepted industry standard (ASME Section XI) for ensuring valve operability with the emphasis placed on the valve being in the closed position. This is consistent with the original intent of the surveillance requirement which is concerned with the potential introduction of bypass leakage path.

No relief is being sought with respect to the three (3) pairs of Suppression Chamber-Reactor Building vacuum breakers, as all three (3) of these are required for postulated post-accident conditions.

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

In the case of the reduction from nine (9) to seven (7) vacuum breaker pairs, 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 analyzed because the Supply System had previously analyzed this specific condition and included a discussion in Volume 12, Chapter 6.2.1.1.4 of the FSAR. This analysis supports safe plant operation with as few as six (6) pairs of Suppression Chamber-Drywell vacuum breakers (WNP-2 has nine (9) pairs for redundancy); or

2) Create the possibility of a new or different kind of accident than previously evaluated because our analysis, as discussed in FSAR Chapter 6.2.1.1.4 confirms adequate conservatism such that the original accident assumptions are still valid with only seven (7) vacuum breaker pairs operable; or

3) Involve a significant reduction in a margin of safety because our analysis confirms the assessment that the technical specifications are overly conservative. The real underlying safety concern is that the vacuum breakers not be inoperable in the open position, or fail such that a path for Suppression Chamber to Drywell bypass leakage is provided. This has not been changed.

In the case of the reduction in surveillance testing from once per 31 days to once per 92 days, the NRC published guidance in the Federal Register (48 FR 14870 dated April 6, 1983) concerning examples of amendments that are not likely to involve significant hazards consideration. One such example, (vi), involves a change "... which either may result in some increase to the probability or consequences of a previously analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: ...". Accordingly, the proposed change to the technical specifications involves no significant hazards consideration.

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.

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,

GC Sorensen

G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh
Attachments

cc: JO Bradfute - NRC
WS Chin - BPA
C Eschels - EFSEC
JB Martin - NRC RV
E Revell - BPA
NS Reynolds - BLCP&R
AD Toth - NRC Site

WNP-2, OL NPF-21, Request For Amendment to Tech. Specs. For Suppression Chamber - Drywell Vacuum Breakers (3/4.6.4 Vacuum Relief)

STATE OF WASHINGTON)
)
County of Benton)

Subject:

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 30 MAY . 1985

GC 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 30th day of May, 1985.

Kathryn H. DuBois
Notary Public in and for the
State of Washington
Residing at Richland, wa

March 1989