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 RECIP. NAME: BUTLER, W.R. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Application for amend to License NPF-21, modifying
 Surveillance Requirement 4.6.1.8.2 to allow individual
 valves to temporarily exceed (a) limit on emergency basis.
 Fee paid.

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Washington Public Power Supply System

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Docket No. 50-397

September 26, 1985

G02-85-642

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 TECHNICAL
SPECIFICATION AMENDMENT UNDER EMERGENCY CIRCUMSTANCES

- References:
- a) Letter, G02-85-640, G. C. Sorensen (Supply System) to W. R. Butler (NRC), "Request for Temporary Waiver of Compliance with Technical Specification 3.6.1.8.b/4.6.1.8.2", dated September 24, 1985
 - b) Letter, Thomas M. Novak (NRC) to G. C. Sorensen (Supply System), "Waiver of Item 3.6.1.8.b of the Technical Specifications for WNP-2", dated September 24, 1985

In the reference letters, the Supply System requested, and the NRC granted, a temporary waiver of LCO action statement 3.6.1.8.b of the WNP-2 Technical Specifications. This action statement requires the plant to initiate a plant shutdown within 24 hours when the drywell and suppression chamber purge supply and/or exhaust isolation valves with resilient seals have a measured leakage rate exceeding the limit of surveillance requirement 4.6.1.8.2 (0.05 L_a when pressurized to P_a for individual valves). In accordance with the Code of Federal Regulations, Title 10, Parts 50.90, 2.101, and 50.91(a)(5), the Supply System hereby submits an amendment to the WNP-2 Technical Specifications on an emergency basis, as provided for in the regulations. Specifically, the Supply System is requesting that surveillance requirement 4.6.1.8.2 be amended to allow individual valves to temporarily exceed the 0.05 L_a limit, so long as the sum of all Type B and C valve tests do not exceed the cumulative total of 0.6 L_a , as required by Appendix J to 10CFR50.

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As previously indicated, at 1410 hours on September 23, 1985, a local leak rate test was conducted on CEP valves 3A and 4A in accordance with the surveillance requirements of 4.6.1.8.2. The measured leakage at that time was 10,500 sccm through both valves. Since the available testing configuration makes it impossible to determine how much leakage is associated with an individual valve, the conservative approach of assuming that the total leakage is assignable to one valve was utilized. Using this method, the measured leakage exceeds that allowed for individual valves ($0.05 L_a$ is 5660 sccm), although the cumulative leakage (44,544 sccm) is well below the maximum allowable of $0.60 L_a$ (67,920 sccm). The measured value was 10,500 sccm (less than $.1 L_a$).

As a result of receiving the position that the interpretation to apply a $.1 L_a$ criteria to a parallel valve test would not be supported, plant staff attempted to improve the leakage condition by washing the seats with air and water surge activities, and by stroking the valves. Historically, this type of activity has not improved the situation, but was the only alternative. Subsequent retest was performed and the leakage had degraded from 10,500 sccm to 18,970 sccm. The total Type B and C leakage is presently at 53,014 sccm or $.47 L_a$.

The Technical Specification stated basis for the surveillance requirement (4.6.1.8.2) rests on providing early detection of resilient material seal degradation, thereby allowing the opportunity for repair before gross leakage failure develops, and to maintain the cumulative leakage limit of $0.60 L_a$.

In this instance, even though the allowable leakage limit of $0.60 L_a$ has not been exceeded, WNP-2 will be required to shut down unless this request for amendment is authorized on an emergency basis. The Supply System had no previous indication of excessive leakage from the previously performed test conducted on these valves per LCO 3.6.1.8, and therefore, no reason to believe that an individual valve would exceed the Technical Specification requirement of $0.05 L_a$. We, therefore, could not reasonably have in fact, submitted our request for waiver and this request for amendment on an emergency basis, in a timely manner. As proposed in the amendment, the Supply System plans to repair the valves in question during the next unscheduled or scheduled shutdown (tentatively scheduled for mid-October).

The form of the requested Technical Specification change maintains the $0.05 L_a$ for the valves that can be tested individually, and applies the single valve criteria to multiple valve tests as well. The specification has been expanded to include the overall limit of $.6 L_a$ to ensure conformance, and requires valve leakage be restored to the $.05 L_a$ limit at the next plant cold shutdown. It also requires that the valves be secured in the closed position to provide assurance that no further degradation from valve operation occurs. This philosophy is identical to that applied in 10CFR50 Appendix J to other Type B penetrations. The increased frequency of six (6) months would still maintain awareness of the valve condition if degraded by a means other than valve operation. The provision for valve operation if the $.05 L_a$

limit is exceeded, is maintained to permit usage of the valves if deemed appropriate, but requires leakage assessment after each cycle to ensure conformance to $.6 L_a$. Under all conditions, the $.6 L_a$ limit applies.

The Supply System has evaluated this request per 10CFR 50.92 and determined that it does not involve a significant hazards consideration because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated, because the basis for the surveillance requirement will continue to be adhered to. Total system integrity remains within limits, with only individual components being affected, and those components will be repaired at the earliest available time;
- 2) Create the possibility of a new or different kind of accident than previously evaluated, because no new leakage paths are being created. In fact, a more conservative approach is being proposed in that the valves are to be secured in the closed position when multiple valve tests exceed $0.05 L_a$, or tested following each actuation to ensure compliance with the cumulative limit of $.6 L_a$;
- 3) Involve a significant reduction in a margin of safety, because no change is being sought in the Appendix J requirements pertaining to total containment integrity with respect to Type B and C testing.

The Supply System has reviewed this change per 10CFR 50.59, 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 Operation Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB).

In accordance with 10CFR 170.21, an application fee of One hundred fifty dollars (\$150.00) accompanies this request. In accordance with 10CFR 50.91, the State of Washington has been provided a copy of this letter.

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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:kjt

cc: RC Barr - BPA
JO Bradfute - NRC
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JB Martin - NRC RV
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