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

SUBJECT: Application for amend to License NPF-31, changing Tech Specs
 3/4.3.5 & 3/4.7.3 to remove requirements re RCIC sys,
 reflecting sys downgrade as result of mods to automatic
 depressurization sys logic. Fee paid.

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Washington Public Power Supply System

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Docket No. 50-397

October 4, 1985
G02-85-694

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 TO REFLECT REACTOR CORE ISOLATION COOLING (RCIC)
SYSTEM DOWNGRADE RESULTING FROM MODIFICATIONS TO AUTOMATIC
DEPRESSURIZATION SYSTEM (ADS) LOGIC

References: a) Letter, G02-83-660, G. C. Sorensen (Supply System) to
A. Schwencer (NRC), dated July 26, 1983
b) Amendment No. 11 to OL NPF-21, dated June 25, 1985

In accordance with the Code of Federal Regulations (CFR), Title 10, Part 50.90 and 2.101, the Supply System hereby requests an amendment to Sections 3/4.3.5 and 3/4.7.3 of the Technical Specifications. The proposed amendment will remove the Technical Specification requirements pertaining to the RCIC system, reflecting a system downgrade as a result of modifications to the ADS logic, which was previously approved and incorporated (reference b).

In reference a), the Supply System committed to implementation of BWROG Option 2 (elimination of the high drywell pressure trip portion of the existing logic, plus addition of a manual inhibit switch) to satisfy the NRC mandated change to the existing ADS system logic (License Condition 18). As a result of this change, the ADS is now responsive to a wider range of transients and, in conjunction with the low pressure ECCS systems, provides an independent and separate backup to HPCS for high pressure events. Therefore, the requirement for RCIC as an HPCS backup is eliminated.

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Elimination of the need for RCIC to mitigate design basis events allows those components necessary for RCIC system operation with no other safety function to be removed from the WNP-2 equipment qualification program. Those RCIC components still required to isolate primary or secondary containment, or whose failure can result in the loss of other Class 1 functions, will remain in the equipment qualification program.

Finally, with implementation of the ADS control logic modification and subsequent downgrade of the RCIC system, the applicable sections of the WNP-2 FSAR and Technical Specifications will be or have been, revised accordingly. The revised sections of the Technical Specifications are enclosed for review and approval. The Supply System has reviewed this change per 10CFR50.59 and determined that no unreviewed safety questions will result from this amendment. This change has been reviewed and approved by the WNP-2 Plant Operations Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB).

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 the safety functions provided by the RCIC system are performed by the ADS in combination with the Low Pressure Injection Systems.
- 2) Create the possibility of a new or different kind of accident than previously evaluated, because no system design functions have been changed.
- 3) Involve a significant reduction in a margin of safety, because ADS, in combination with Low Pressure Injection Systems, provides the same function previously accomplished by the RCIC system with no reduction in overall system performance criteria.

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).



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In accordance with 10CFR 50.91, the State of Washington has been provided a copy of this letter. 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

Attachments

cc: RC Barr - BPA
JO Bradfute - NRC
C. Eschels - EFSEC
JB Martin - NRC RV
E. Revelle - BPA
AD Toth - NRC Site



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