

REGULATOR INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8510210095 DOC. DATE: 85/10/14 NOTARIZED: YES DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME: SORENSEN, G.C. AUTHOR AFFILIATION: Washington Public Power Supply System
 RECIP. NAME: BUTLER, W.R. RECIPIENT AFFILIATION: Licensing Branch 2

SUBJECT: Application for amend to License NPF-21, changing License Condition 16 to implement installation or upgrade requirements of Rev 2 to Reg Guide 1.97 for flux monitoring prior to startup following second refueling outage. Fee paid.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 4
 TITLE: OR Submittal: General Distribution

NOTES:

05000397

OL: 12/20/83

RECIPIENT			COPIES		RECIPIENT			COPIES	
ID	CODE/NAME		LTTR	ENCL	ID	CODE/NAME	LTTR	ENCL	
NRR LB2 BC	01		7	7					
INTERNAL: ACRS	09		6	6	ADM/LFMB		1	0	
ELD/HDS2			1	0	NRR/DE/MTEB		1	1	
NRR/DL DIR			1	1	NRR/DL/ORAB		1	0	
NRR/DL/TSRG			1	1	NRR/DSI/METB		1	1	
NRR/DSI/RAB			1	1	REG FILE	04	1	1	
RGNS			1	1					
EXTERNAL: 24X			1	1	EG&G BRUSKE, S		1	1	
LPDR	03		1	1	NRC PDR	02	1	1	
NSIC	05		1	1					

Rec'd w/ check #150.00
 #4460

TOTAL NUMBER OF COPIES REQUIRED: LTTR 28 ENCL 25

Washington Public Power Supply System

3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

Docket No. 50-397

October 14, 1985

G02-85-724

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

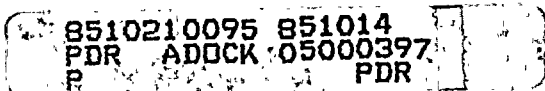
Dear Mr. Butler:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT TO
LICENSE CONDITION 16, ATTACHMENT 2, ITEM 3(b)

Reference: Phone conversation, Mr. P. L. Powell (Supply System) et al,
and Messrs. J. O. Bradfute and J. Joyce (NRC), same subject,
on October 1, 1985

The subject license condition requires the Supply System to implement (installation or upgrade) requirements of Regulatory Guide 1.97, Rev. 2 for flux monitoring prior to startup, following the first refueling outage. As discussed in the reference phone conversation, technical problems with the available monitor designs require resolution before a commitment with one design can be made. Additionally, the procurement schedules available at this time cannot support installation by the end of the first refueling outage (scheduled approximately June 1, 1986).

One of the two available detector designs (external core) is currently being tested on Boiling Water Reactors and apparently, has sensitivity problems at low power and low moderator temperatures. The other detector (incore) installs from the top of the reactor vessel, requiring reactor vessel head removal for installation, maintenance, and removal. The detector may be removed from the bottom of the vessel, however, the amount of activation received by this design will make removal extremely difficult, with component radiation levels exceeding those levels presently experienced with TIP and other incore instrumentation maintenance and removal. A timely resolution of these concerns does not appear imminent at this time. Given procurement lead times, the unresolved technical concerns and the need for a deliberate engineering evaluation and selection process, installation by the first refueling outage is not attainable.



App
11
Rec'd w/Check \$150.00
#4460

Mr. W. R. Butler
Page Two
October 14, 1985
G02-85-724

Accordingly, per 10 CFR Parts 50.90 and 2.101, the Supply System hereby requests the subject license condition be amended as follows:

- (b) The Licensee shall implement (installation or upgrade) requirements of R.G. 1.97 Rev. 2 for flux monitoring prior to startup following the second refueling outage.

This change is requested to allow the Supply System to complete an evaluation of the available alternatives and the resolution of the technical concerns known at this time, and to install the equipment that will provide the greatest assurance of continued safe operation of WNP-2 on the most cost effective basis. As indicated in the EG&G Idaho, Inc. report, published in March, 1985 for the NRC on this same subject, "A Category 1 system that meets all the criteria of Regulatory Guide 1.97 is an industry development item." The Supply System shall continue to follow industry development of this equipment, evaluate newly developed equipment, and install qualified equipment consistent with our license condition schedule.

The Supply System has reviewed the requested amendment per 10 CFR 50.59 and 50.92, and has determined that no unreviewed safety questions or significant hazards will result. Further, the proposed change will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated, because the existing instrumentation consists of four redundant safety-related channels, with the exception of environmental qualification, and in the unlikely event of an accident condition prior to replacement, there are additional systems in place to provide operators with sufficient data to assess reactor conditions (e.g., control rod position monitors, reactor vessel level and pressure monitors, etc.). Therefore, this change does not represent a significant increase in the probability or consequences of a previously evaluated accident.
- 2) Create the possibility of a new or different kind of accident, because no function of the flux monitor system is being changed; therefore, no new or different kind of accident is conceivable.
- 3) Involve a significant reduction in a safety margin as adequate instrumentation is provided to allow the operator to assess reactor conditions without this monitor in the unlikely event of an accident condition failing the monitor prior to replacement.

In guidance provided by the staff (Federal Register Vol. 48, No. 67, April 6, 1983), examples of amendments that are not likely to involve a significant hazards consideration are listed. Example vii, "A change to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations" is cited in this request. This change has been reviewed and approved by the Plant Operations Committee and the Supply System Corporate Nuclear Safety Review Board.

Mr. W. R. Butler
Page Three
October 14, 1985
G02-85-724

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

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:kjt

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

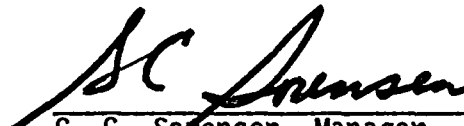
WNP-2
Request for Amendment to
License Condition #16
Attachment 2, Item 3(b)

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 14 Oct., 1985



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 14 day of October, 1985.



Notary Public in and for the
State of Washington

Residing at Richland, wa.
Dec 85

