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AUTH.NAME AUTHOR AFFILIATION
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 Limiting Condition for Operation 3.3.7.7 to allow LPRM calibr using four detectors in traversing in-core probe sys.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

Docket No. 50-397

October 17, 1985
G02-85-729

Director of Nuclear Reactor Regulation
Attention: Mr. W. R. Butler, Chief
Licensing Branch No. 2
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 AMENDMEMENT UNDER EMERGENCY CIRCUMSTANCES

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 the Limiting Condition for Operation 3.3.7.7 be changed (as attached) to allow LPRM calibration under certain conditions using four detectors in the Traversing In-Core Probe (TIP) system versus the five presently required.

The Technical Specification states that the TIP system shall be operable with five detectors when calibrating the LPRM detectors. One of the TIP machines is inoperable and Supply System personnel approached the NRC staff (Region V and NRR offices on September 4, and September 5, 1985) with a proposal to allow calibration of LPRMs in the inaccessible strings by the use of base distributions in symmetric strings which are accessible by one of the remaining 4 operable TIP machines. (With the reactor core operating in an 'A' type control rod pattern, symmetry exists between strings which are inaccessible and those which are accessible by an operable TIP machine.) Ad Hoc approval was provided by both NRR and Region V.

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The administrative process in obtaining this approval has drawn questions and has resulted in the need to change the subject technical specification to reflect the ability to calibrate using the above methodology. Absent approval of this change on an emergency basis, WNP-2 will be required to remain below 25% power until the inoperable probe is returned to service. Below 25% power, reliance on the LPRM calibration is not required.

The Supply System did not foresee the informal approval of the calibration methodology being questioned and was proceeding to process a technical specification amendment change under the normal process. It was not until questions arose on the informal approvals that it became evident that an emergency technical specification change was necessary. We therefore could not reasonably have, infact, submitted our request in a timely manner.

The Supply System has evaluated this request per 10CFR50.92 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 calibration of LPRMs using symmetric string base distribution provides LPRM data within the normal uncertainty expected for calibrations with all five machines operable. Consequently, this condition will not adversely affect core thermal limit calculations and thus the probability or consequences of an accident, as previously evaluated, are not changed.

2) Create the possibility of a new or different kind of accident than previously evaluated because margins to safety limits, for the core, are not affected.

3) Involve a significant reduction in a margin of safety because calibration of inaccessible LPRM strings using symmetric string base flux distribution data from symmetric strings which are accessible by an operable TIP machine is within the normal uncertainty limits obtained with five TIP machines operable.

It is the Supply Systems intention to return the inoperable TIP to service at the most opportune time. Present conditions in the Pacific Northwest require WNP-2 to remain at power. The inoperable probe will be repaired at the next planned or forced outage or prior to changing to an asymmetric control rod pattern.

The Supply System has reviewed this change per 10CFR50.59, 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 10CFR170.21, an application fee of One hundred fifty dollars (150.00) accompanies this request. In accordance with 10CFR50.91, 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/sis

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

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: G02-85-729

I, P. L. Powell, being duly sworn, subscribe to and say that I am the WNP-2 Licensing Manager, 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 October 17, 1985

P. L. Powell, Manager

WNP-2 Licensing

On this day personally appeared before me P. L. Powell to me known to be the individual who executed the foregoing instrument and acknowledged 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 17 day of October, 1985.

Peggy L. Ledford
Notary

On this day personally appeared

WNP-2 Licensing

P. L. Powell, Manager
WNP-2 Lic