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 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397  
 AUTH. NAME: AUTHOR AFFILIATION  
 SORESEN, 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, revising Tech Specs  
 to allow reactor mode changes w/isolated primary of  
 secondary containment isolation valves w/no degradation to  
 public health & safety. Fee paid.

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NOTES:

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A large, detailed black and white photograph of a dense, multi-story building complex, likely a residential or institutional structure, with many windows and a complex roofline. The building is surrounded by trees and other structures, suggesting an urban or suburban setting. The image is oriented horizontally but appears to be a vertical photograph rotated 90 degrees clockwise.

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## Washington Public Power Supply System

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

October 28, 1985

G02-85-740

Docket No. 50-397

Director of Nuclear Reactor Regulation  
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 (3/4.6.3 and 3/4.6.5)

Reference: None

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 Sections 3/4.6.3 (Primary Containment Isolation Valves), and 3/4.6.5 (Secondary Containment Integrity) of the WNP-2 Technical Specifications. The proposed amendment will allow reactor mode changes with isolated primary or secondary containment isolation valves with no degradation to public health or safety.

This request is based on the Supply System's conclusion that plant operational condition changes with the specific component(s) inoperable but isolated, and with the associated system (primary/secondary containment) operable, does not affect plant safety.

Specification 3.0.4 is provided to "... ensure that unit operation is not initiated with either required equipment or systems inoperable or other limits being exceeded." However, exceptions are provided "... when startup with inoperable equipment would not affect plant safety."

In order to ensure that the primary containment meets its design function, isolation valves are provided. The Technical Specification bases for 3.6.3 states "The OPERABILITY of the primary containment isolation valves ensures that the containment atmosphere will be isolated from the outside environment in the event of a release of radioactive material to the containment atmosphere or pressurization of the containment." Therefore, the intent of this specification is to ensure that all lines

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with isolation valves will be isolated if conditions exist which require the primary containment to perform this design function. This intent can be met by either an operable automatic isolation valve or a closed valve (or otherwise isolated line). Since plant safety is not degraded when an automatic isolation valve is inoperable, but secured in its isolated position per this specification, the issue related to operational condition changes should be predicated on requirements other than primary containment integrity. The requirements are adequately covered by other LCO's when considering the effect action execution has on system operability. Since plant safety is not degraded by operation with an inoperable primary containment isolation valve, provided the penetration is correctly isolated, it is reasonable to allow the exemption to specification 3.0.4.

The same rationale applies to the secondary containment isolation requirements. In order to ensure that the secondary containment meets its design function, among other things, isolation valves are provided. With respect to the isolation valves that make up a part of the secondary containment boundary, their intended function can be met either by an OPERABLE isolation valve, or a secured (e.g., isolated) isolation valve. Since plant safety is not degraded when an automatic isolation valve is inoperable, but secured in its isolated position per this specification, the question of operational condition changes should be based on other factors.

The Supply System has reviewed this change per 10CFR 50.59 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 it merely allows operational mode changes with the primary or secondary containment isolated with an inoperable, but otherwise secured (isolated), isolation valve.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because this change does not affect or degrade the primary or secondary containment integrity, nor does it affect other systems important to safety.
- 3) Involve a significant reduction in the margin of safety because the margin of safety is not affected since this specification continues to provide for required isolation barriers to be in the isolated condition as required by the design.



Mr. W. R. Butler  
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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).

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

Should you have any questions regarding this matter, please contact Mr. P. L. Powell, Manager, WNP2 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 Revell	BPA
	AD Toth	NRC Site
	NS Reynolds	BLCP&R

STATE OF WASHINGTON     )  
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County of Benton         )

NUCLEAR PLANT 2  
REQUEST FOR TECHNICAL SPECIFICATION  
Subject: AMENDMENT (3/4.6.3 & 3/4.6.5)

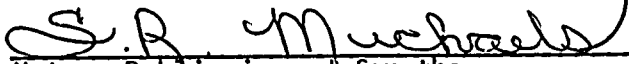
I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE 25 OCTOBER, 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 25 day of October, 1985.

  
\_\_\_\_\_  
Notary Public in and for the  
State of Washington

Residing at Richland, wa.  
Dec 85

