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RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Application for amend to License NPF-21, revising Tech Spec 3/4.3.5, "RCIC Sys Actuation Instrumentation," reflecting downgrade resulting from mods to automatic depressurization sys logic.

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December 5, 1985
G02-85-817

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Ms. E. G. Adensam, Project Director
BWR Project Directorate No. 3
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

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, SUPPLEMENTAL INFORMATION

References:
1) Letter, G02-83-660, G. C. Sorensen (SS) to A. Schwencer (NRC), dated July 26, 1983
2) Amendment No. 11 to OL NPF-21, dated June 25, 1985
3) Letter, G02-85-694, G. C. Sorensen (SS) to W. R. Butler (NRC), dated October 4, 1985

The referenced letters discuss the background to and request for the downgrade of the Reactor Core Isolation Cooling System. This letter supplies additional information about the proposed technical specification amendment and addresses questions asked by Messrs. Bradfute and Hodges during October 25, November 5, and November 18, 1985 phone conversations on this subject.

In those phone conversations, additional clarification was requested on three topics. The first was a concern for minimizing the potential for spurious automatic actuations of the RCIC system. To address this, the marked up Technical Specification 3/4.3.5 now retains the requirements for the automatic initiation instrumentation and its surveillance and only modifies the action requirements to those appropriate with the downgraded status of RCIC. Similarly, the second topic was the potential for RCIC operation to overfill the reactor vessel. To address this, the marked up Technical Specification 3/4.3.5 now also retains the requirements for the RCIC high reactor water level trip instrumentation.

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The only change is to again modify the action requirements to those appropriate with the downgraded status of RCIC. The other two parts of the RCIC instrumentation system addressed in 3/4.3.5, specifically the condensate storage tank low water level transfer and the manual initiation, remain removed from this Technical Specification as is appropriate for the RCIC downgrade. With the upgrade of the ADS actuation logic, these functions are no longer required to demonstrate RCIC availability as a functioning backup to HPCS for design basis events. Additionally, based on the limitations placed on minimum condensate storage tank levels and the high suppression pool level switchover logic built into the HPCS system design, a minimum of 141 minutes is available to the operator to allow manual RCIC transfer to the suppression pool from the condensate storage tanks. The safety significance of deleting manual RCIC initiation from this table also should not be an issue since, as discussed above, operation in either the automatic or manual mode is not required to mitigate design basis events.

Both the condensate storage tank low water level transfer and manual initiation functions will be tested in accordance with the balance of plant portion of the plant maintenance and test procedures. Additionally, the RCIC system will continue to utilize the condensate storage tanks as the preferred make-up water source for plant isolation events.

The last topic was the concern for maintaining RCIC pump discharge piping to the reactor vessel full of water to minimize the potential for water hammer effects. The surveillance requirement for verifying high point venting and complete filling of the piping was removed when the entire RCIC system Technical Specification 3/4.7.3 was removed in the proposed amendment. However, the quarterly ASME pump and valve surveillance testing which is still required by Technical Specification 4.0.5 incorporates in its procedures a verification of full system discharge piping by high point venting. It should also be noted that RCIC system discharge piping pressurization is monitored continuously and alarmed by an annunciator in the Control Room. Thus, any time that the RCIC waterleg pump should fail, system injection line pressure will decrease and an alarm in the Control Room will alert the operators to a potential system fill deficiency. This provides the operators with a warning that RCIC system fill status may be in jeopardy and requires a verification of system fill.

Additionally, the remaining parts of the deleted surveillance section (4.7.3) for RCIC, specifically the valve lineup verification, flow controller and 18 month surveillance requirements will be retained and transferred to the balance of plant portion of the plant maintenance and test procedures.

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/tmh
Attachments

cc: RC Barr - BPA
JO Bradfute - NRC
C Eschels - EFSEC
JB Martin - NRC RV
E Revell - BPA
NS Reynolds - BLCP&R
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