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 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397  
 AUTH. NAME AUTHOR AFFILIATION  
 SORENSEN, G. C. Washington Public Power Supply System  
 RECIP. NAME RECIPIENT AFFILIATION  
 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Application for amend to License NPF-21, revising Tech Spec  
 Sections 3.6.1.8 & 4.6.1.8.3 to change time for purging  
 through standby gas treatment sys to 150 h per  
 365 days from present 90 h allotted. Fee paid.

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100-3501  
Application for amount to License 100-3501, and 100-3502  
Application 100-3501 to change name for purpose  
of being admitted as treatment eye to 100-3501 per  
the day from 100-3501 to 100-3501, 100-3501.

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## Washington Public Power Supply System

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

December 20, 1985

G02-85-858

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

Subject: NUCLEAR PLANT NO. 2  
OPERATING LICENSE NPF-21, REQUEST FOR  
TECHNICAL SPECIFICATION AMENDMENT, DRYWELL  
AND SUPPRESSION CHAMBER PURGE SYSTEM SECTION 3.6.1.8

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby requests an amendment to Section 3.6.1.8 and 4.6.1.8.3 of the technical specifications. Specifically, the Supply System is requesting the time for purging through the standby gas treatment system be changed to 150 hours per 365 days from the present 90 hours allotted (See Attachment A).

As documented in earlier correspondence with the NRC, WNP-2 has been experiencing mechanical problems with Recirculation Pump B, leading ultimately to the shutdown of the pump until repairs can be made in the future. In investigating and attempting to troubleshoot these mechanical problems (instrumenting the pump, vibration dampening hardware installation, valve repair work, etc.) an unanticipated number of containment entries were necessary. This effort required more de-inerting/inerting time and consequently the majority of the 90 hour allotment was used. It is estimated that approximately 66 hours of the presently allowed 90 hours was expended to permit troubleshooting/investigation containment entries to be made (Attachment B). Currently, approximately 80 hours total have been used and the remaining 10 hours must be allocated from the present to April 9, 1986, the end of our 365 day period. Should containment entry or even a minimum amount of purging be required during this period, it is evident that compliance with the 90 hours would cause undue hardship due to plant maneuvering limitations.

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REQUEST FOR TECHNICAL SPECIFICATION AMENDMENT, DRYWELL AND  
SUPPRESSION CHAMBER PURGE SYSTEM SECTION 3.6.1.8

Attachment B provides the current and past operating history with respect to containment de-inerting and inerting while utilizing the drywell and/or suppression chamber purge supply and/or exhaust butterfly isolation valves. As shown, with the exception of the use for containment entry to troubleshoot and investigate Recirculation Pump problems, these activities have been conservative and responsive to the intent of the technical specification, which is to minimize the amount of time the standby gas treatment system is used in conjunction with these valves during plant operation.

The Supply System considers that the requested 150 hours is sufficient to allow continued operation until April 9, 1986 and is necessary to accommodate similar investigative and troubleshooting-type activities in the future. A change to the Bases has also been included to correct an error since license issuance.

The Supply System has evaluated this request per 10 CFR 50.59 and 50.92 and has determined that no unreviewed safety questions or significant hazards will result relative to containment system integrity. Further, the proposed change will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. Primary containment integrity is maintained by the operable isolation function of the valves and is not affected by this amendment.
- 2) Create the possibility of a new or different kind of accident than previously evaluated because no new designs or plant operating modes or the scope of the LCO are affected by this amendment.
- 3) Involve a significant reduction in a margin of safety because, as discussed in 1) above, the amendment does not affect primary containment integrity.

The Supply System recognizes the concerns presented in Standard Review Plan (SRP) 6.2.4 and Branch Technical Position CSB 6-4. Since it is requested that only the 90 hour limit be increased by, in our judgment, an insignificant amount over the 365 day period, the 10 CFR 100 and ESF equipment analyses waived by SRP 6.2.4, Paragraph II.8 continues to apply for the 150 hour limit. It should also be recognized that no purge or venting operation using standby gas treatment is allowed by the technical specifications without both trains being operable per LCO 3/4 11.2.8 and purge system operation is further restricted using one train only (LCO 3/4.11.2.8.). This ensures, despite the unlikely event of a LOCA occurring during purging or venting, that an operable standby gas treatment system is available post-LOCA. It is our belief that this requirement (LCO 3/4 11.2.8) formed an essential part of the bases for permitting a limited amount of operating time without the ESF evaluation referred to in SRP 6.2.4.



E. G. Adensam

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REQUEST FOR TECHNICAL SPECIFICATION AMENDMENT, DRYWELL AND  
SUPPRESSION CHAMBER PURGE SYSTEM SECTION 3.6.1.8

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 VI,

"A change which either may result in some increase to the probability or consequences of a previously-analyzed accident or may reduce in some way a safety margin, but where the results of the change are clearly within all acceptable criteria with respect to the system or component specified in the Standard Review Plan: for example, a change resulting from the application of a small refinement of a previously used calculational model or design method"

is cited in support of this request.

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).

If insufficient time is available to process this request, a potentially more expeditious solution would be to concur that it would be acceptable to re-initialize the Supply System's existing 90 hour clock to  $t_0$  at either a specified time or when 90 hours is reached. This would have no impact from a statistical standpoint, as the probabilities start anew each time the system is operated successfully. This would be considered on a one time basis only. We are unsure of the mechanism by which this would be administered and therefore provide it as a suggestion only.

In accordance with 10 CFR 170.21, an application fee of One Hundred fifty dollars (\$150.00) accompanies this request. In accordance with 10 CFR 50.91, the State of Washington has been provided a copy of this letter.

It is requested that this request be expeditiously processed. Obviously, at present this condition does not warrant an emergency request. However, future events may abruptly change this status and it may become necessary, should the remaining 10 hours be used, to elevate this request to an Emergency status. Should you require any further information or assistance to aid in evaluating this request, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

PLP/tmh  
Attachments

cc: RC Barr- BPA  
JO Bradfute - NRC  
C Eschels - EFSEC  
JB Martin - NRC RV

E Revel - BPA  
NS Reynolds - BLCP&R  
AD Toth - NRC Site

STATE OF WASHINGTON     )  
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Subject: \_\_\_\_\_

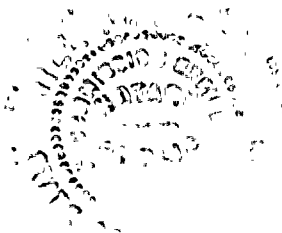
I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information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

DATE 20 DEC, 1985

G. C. Sorensen  
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 20<sup>th</sup> day of December, 1985.



L. M. Moore  
Notary Public in and for the  
State of Washington  
Residing at Richland  
Commission expires 7/4/88





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