

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 8601270226 DOC. DATE: 86/01/17 NOTARIZED: NO DOCKET #
 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 Section
 4.6.4. to change surveillance frequency for operability
 demonstration of vacuum breaker pairs & position indicators
 from 31 to 92 days. Fee paid.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 5+1
 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
BWR	ADTS	1	0	BWR	PD3 PD 01	5	5
BWR	EB	1	1	BWR	EICSB	1	1
BWR	FOB	1	1	BRADFUTE, J		1	1
BWR	PSB	1	1	BWR	RSB	1	1
INTERNAL:	ACRS 09	6	6	ADM/LFMB		1	0
	ELD/HDS2	1	0	NRR/DHFT/TSCB		1	1
	<u>NRR/DSRO/RRAB</u>	1	1	NRR/ORAS		1	0
	<u>REG FILE</u> 04	1	1	RGN5		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
 # 4704*

TOTAL NUMBER OF COPIES REQUIRED: LTTR 30 ENCL 26

The following information was obtained from the records of the
 Department of the Interior, Bureau of Land Management, at
 Washington, D. C., on the subject of the land owned by the
 United States in the State of California, and the same is
 being furnished to you for your information.

The total area of land owned by the United States in the State of California is approximately 10,000,000 acres.

The following is a list of the principal types of land owned by the United States in the State of California:

Type of Land	Number of Acres	Percentage of Total	Remarks
Public Domain	1,000,000	10.00	Land not yet surveyed or reserved.
National Forest	5,000,000	50.00	Land reserved for national forest.
National Monument	1,000,000	10.00	Land reserved for national monument.
National Preserve	1,000,000	10.00	Land reserved for national preserve.
National Shrine	1,000,000	10.00	Land reserved for national shrine.
National Cemetery	1,000,000	10.00	Land reserved for national cemetery.
National Park	1,000,000	10.00	Land reserved for national park.
National Monument	1,000,000	10.00	Land reserved for national monument.
National Preserve	1,000,000	10.00	Land reserved for national preserve.
National Shrine	1,000,000	10.00	Land reserved for national shrine.
National Cemetery	1,000,000	10.00	Land reserved for national cemetery.
National Park	1,000,000	10.00	Land reserved for national park.

The above information is being furnished to you for your information.

Very respectfully,
 Your obedient servant,
 [Signature]

[Name]
 [Title]

[Address]

[City, State, and Zip]

[Phone Number]

[Fax Number]

[E-mail Address]

[Other Information]

[Page Number]

[Date]

Washington Public Power Supply System

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

January 17, 1986
G02-86-080

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 AMENDMENT TO
TECHNICAL SPECIFICATION FOR SUPPRESSION CHAMBER -
DRYWELL VACUUM BREAKERS (SECTION 4.6.4.1)

Reference: 1) Letter, G02-85-278, G. C. Sorensen (SS) to W. R.
Butler (NRC), "Request for Amendment to Technical
Specifications for Suppression Chamber - Drywell
Vacuum Breakers (3/4.6.4 Vacuum Relief)", dated
May 30, 1985

The reference requested changes to technical specification 3/4.6.4 to:
1) allow two of the nine suppression chamber - drywell vacuum breakers
to be inoperable in the closed position without entry into a limiting
condition for operation (Section 3.6.4.1), and 2) change the frequency
of the surveillance requirement to demonstrate operability of the
vacuum breaker pairs and position indicators from 31 to 92 days
(Section 4.6.4.1). Subsequent conversations with your staff have
indicated that the change to Section 3.6.4.1 allowing two of the nine
vacuum breakers to be inoperable in the closed position without entry
into a limiting condition for operation is acceptable and will be pro-
cessed as an eventual amendment to the WNP-2 technical specifications.
At the same time, the change to Section 4.6.4.1 has been deferred
awaiting additional supporting justification. This letter provides
that justification.

8601270226 860117
PDR ADDCK 05000397
P PDR

A001
1/1
Rec'd w/att-cc #150.00
#4704

E. G. Adensam
Page Two
January 17, 1986

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION FOR SUPPRESSION
CHAMBER - DRYWELL VACUUM BREAKERS (SECTION 4.6.4.1)

In light of the recent Office of Nuclear Reactor Regulation staff reorganization, the Supply System is requesting that the two requests made in the reference be processed as separate technical specification amendments, thus allowing the change to 3.6.4.1 to proceed without awaiting the review cycle necessary for both the change to Section 4.6.4.1 and additional technical information provided herein. This will expedite approval of the change to Section 3.6.4.1 and accommodate any change in review responsibility for Section 4.6.4.1 due to the reorganization of NRR.

Accordingly, per 10 CFR 50.91 and 2.101, this letter requests an amendment to Section 4.6.4.1 of the WNP-2 technical specifications to change the surveillance frequency for operability demonstration from 31 to 92 days (see attached). In support of this request, the following additional justification is provided:

- 1) The bases for cycling the vacuum breakers within two hours after discharge of steam to the suppression pool from a main steam safety relief valve is to vent the air injected into the wetwell air space from the SRV discharge line. Stroking is intended to provide assurance that the valve is closed. The Supply System considers that the current format in the standard technical specifications is related to a plant design having one vacuum breaker valve in lieu of a dual/independent actuating disc valve design or any other type of redundant design. WNP-2 utilizes a dual disc design that under manual actuating conditions limits actuation of one disc at a time to preclude establishing a bypass leakage path. Therefore, the WNP-2 design does not enable venting of the suppression pool by valve actuation.
- 2) The root of the bases comes from the concern that the bypass leakage criteria, stated in Limiting Condition for Operation Section 3/4.6.2.1, of $.05 \text{ ft}^3$ may be exceeded by the combination of whatever the acceptable leakage value may be at the time and the partially stuck open vacuum breaker (caused by the SRV actuation). The Supply System considers that the redundancy in the WNP-2 design addresses the concern of a stuck open valve at the time of a DBA and that testing the valves per ASME Section XI is sufficient to maintain operability. Position verification every week is satisfactory but due to the quantity of daily verification already required by the technical specifications, the Supply System proposes to verify vacuum breaker position daily. Additionally, the periodically imposed surveillances as proposed are more easily administered than event initiated and the probability of a missed surveillance is subsequently reduced.

E. G. Adensam

Page Three

January 17, 1986

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION FOR SUPPRESSION
CHAMBER - DRYWELL VACUUM BREAKERS (SECTION 4.6.4.1)

- 3) The valve position indicating design employs a low voltage D.C. circuit relying on valve closure to complete the circuit of two position sensing devices in series. This fixed position design is very sensitive to disc movement. The soft seat seal is also maintained beyond the point at which a change in indication has occurred. To date, no valve has failed to stroke or properly seat during performance of the required technical specification testing. In periodic inspections of the valve seat material, WNP-2 has not identified any failures due to valve actuation. However, it is also apparent that any unnecessary cycling will reduce seal lifetime. The 18 month surveillance test is more suitably called a channel functional test and will verify proper operation of the interlock function.

In summary, the presently subscribed testing per ASME Section XI satisfactorily demonstrates operability and daily position verification ensures containment integrity on a daily frequency. Valve operability is enhanced by the dual disc design with a proven reliability and the vacuum breakers function as check valves, automatically relieving any wetwell over pressure to the drywell. Thus, bypass leakage is not a concern.

The Supply System has reviewed this change per 10 CFR 50.59 and determined that no unreviewed safety questions will result from this amendment. Additionally, this change has been reviewed per 10 CFR 50.92 and it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously analyzed because the plant specific dual/independent actuating disc valve design ensures no bypass leakage path is available through the valves at any time. Thus, the concerns for which the technical specification was intended to account for have been accounted for by design. Therefore, the previously analyzed probability or consequences of an accident are not affected by this change.
- 2) Create the possibility of a new or different kind of accident because no function or features of the vacuum breakers and position indication are being changed; therefore, no new or different kind of accident is conceivable.
- 3) Involve a significant reduction in a safety margin because the dual disc/independent actuating design ensures no leakage path is available. Hence, the need to perform valve cycling to confirm containment integrity is obviated by a unique design that prevents a leakage path passively. The margin of safety assured by this technical specification is not reduced but, by using the frequency specified by ASME Section XI and avoiding that presently prescribed, is most likely enhanced due to a longer life expectancy for the valve seat material.

E. G. Adensam

Page Four

January 17, 1986

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION FOR SUPPRESSION
CHAMBER - DRYWELL VACUUM BREAKERS (SECTION 4.6.4.1)

This change has been reviewed by the Plant Operations Committee and the
Supply System Corporate Nuclear Safety Review Board.

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 further questions, please
contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP/MRW/tmh
Attachments

cc: RC Barr - BPA
JO Bradfute - NRC
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: OPERATING LICENSE NPF-21,
REQUEST FOR AMENDMENT TO
TECHNICAL SPECIFICATION
FOR SUPPRESSION CHAMBER -
DRYWELL VACUUM BREAKERS
(SECTION 4.6.4.1)

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 17 JAN, 1986

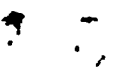
G. C. Sorensen
G. C. Sorensen, Manager
Regulatory Programs

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 17th day of January, 1986.

Harry A. Schumaker
Notary Public in and for the
State of Washington

Residing at Spokane



1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

29

30

31

32

33

34

35

36

37

38

39

40

41

42

43

44

45

46

47

48

49

50

51

52

53

54

55

56

57

58

59

60

61

62

