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ACCESSION NBR: 8601270233 DOC. DATE: 86/01/17 NOTARIZED: YES DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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 SORESEN, G. C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION

SUBJECT: Application for amend to License NPF-21, modifying Tech Spec
 Table 3.6.3-1, "Primary Containment Isolation Valves" &
 changing valve FPC-V-149 from manual to automatic. Fee paid.

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1. The first part of the report is a general introduction to the subject of the study. It discusses the importance of the study and the objectives of the research.

2. The second part of the report is a detailed description of the methodology used in the study. It includes information about the sample size, the data collection methods, and the statistical analysis techniques.

3. The third part of the report is a discussion of the results of the study. It presents the findings of the research and discusses their implications for the field of study.

4. The fourth part of the report is a conclusion and a summary of the main findings of the study.

Washington Public Power Supply System

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

January 17, 1986
G02-86-083

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 SPECIFICATIONS
(TABLE 3.6.3-1)

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby requests an amendment to the WNP-2 Technical Specifications. Specifically, the following changes are being requested:

- 1) Modify Table 3.6.3-1, Primary Containment Isolation Valves
- 2) Change Valve FPC-V-149 from manual to automatic.

Change No. 1 (Pages 3/4 6-22 thru 6-32 inclusive)

This change is being requested in order to incorporate corrections/additions to excess flow check valves, TIP valves, and equipment qualification limits, as well as to re-identify certain valves to reflect current Supply System practices.

A recent review of this section led us to conclude that a number of valves in Table 3.6.3-1 are inappropriately assigned limits for valve stroke time. The only times given in Table 3.6.3-1 which are required specifically by the Chapter 15 analyses are the MSIV closure times of 5 seconds. The vent and purge system isolation valves are required to stroke closed in 4 seconds in order to comply with Branch Technical Position (BTP) CSB 6-4, Containment Purging During Normal Plant Operations. The other stroke times given in this table are, in general, based on design minimums.

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E. G. Adensam

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS (TABLE 3.6.3-1)

It is the Supply System's position that it is not necessary to apply standard commercial valve stroke times as limits for valve operability, which is covered by ASME, Section XI. Where valid stroke time limits are necessary to ensure the adequacy of the primary containment isolation system, these limits need to be included in Table 3.6.3-1. The remainder, those which do not represent a limit required for containment isolation, should be deleted from this table.

The limits for any valve in section d, Other Containment Isolation Valves, have been deleted from the table. These valves are either manually actuated only or are automatically stroked open/closed for reasons other than containment isolation. They are not identified as requiring Primary Containment and Reactor Vessel Isolation System (PCRVIS) signals in FSAR Section 6.2.4, Containment Isolation System, and therefore none of these values represent valid limits for containment isolation.

The Supply System has reviewed this change per 10 CFR 50.92 and determined that it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because it is merely correcting the items in the table that were previously evaluated in the FSAR.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because this change does not alter conditions assumed in the FSAR evaluation.
- 3) Involve a significant reduction in the margin of safety because no limits are being altered that are required for containment isolation.

Change No. 2

This change is being requested in order to provide a redundant motor-operated isolation valve in the suppression pool cleanup return line. This automatic valve has been added as a result of a Fuel Pool Cooling (FPC) upgrade that was accomplished in order to meet the GDC, and is being added (modified) in order to 1) allow use of the FPC filter-demins for suppression pool cleanup during reactor operations, and 2) maintain level in the suppression pool. Without the ability to utilize this automatic valve, suppression pool level will have to be maintained utilizing an RHR pump, thereby unnecessarily challenging an ECCS function.

The Supply System expects to be in a position to utilize this valve in late February or early March. In order to avoid any unnecessary challenges to plant safety systems, we therefore request an expedited review cycle for this amendment. We stand ready to assist the Staff in any way we can.



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E. G. Adensam

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS (TABLE 3.6.3-1)

The Supply System has reviewed this change per 10 CFR 50.92 and determined that it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because this change contributes to upgrade of suppression pool cleanup portion of FPC system, and adds a second valve in series for containment isolation.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because this change uses previously approved methods and does not introduce a new accident mode.
- 3) Involve a significant reduction in the margin of safety because the system upgrade should actually lessen the chance of an accident or malfunction by providing an automatic, redundant isolation function.

The Supply System has reviewed this change per 10 CFR 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 and the Supply System Corporate Nuclear Safety Review Board.

The Supply System has evaluated this request in accordance with the criteria contained 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 questions regarding this matter, 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
AD Toth - NRC Site

STATE OF WASHINGTON)
)
County of Benton)

Subject: OPERATING LICENSE NPF-21,
 REQUEST FOR AMENDMENT TO
 TECHNICAL SPECIFICATIONS

 (TABLE 3.6.3-1)

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 January, 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.

Notary Public in and for the
State of Washington

Residing at Richmond



ATTACHMENT

1. Move RCIC-V-64 from section a. Automatic Isolation Valves to section c. Manual Containment Isolation Valves of Technical Specification Table 3.6.3-1 (pgs. 6-24 and 6-27).
2. Correct the EPN's for PI-EFC-X29b/d, X29e/f, X30d/f, X42e/f and X69d/f to the MEL listings of PI-EFC-X29d, X29f, X30a, X42f and X69f (pg. 6-24).
3. Under section b. Excess Flow Check Valves, move PI-EFC-X66, X67, X82b, X84a and X119 from the listing of Reactor Pressure Vessel and PI-EFC-X86A, X86B, X87A and X87B from the listing Other to Containment Atmosphere (pgs. 6-24, 6-25 and 6-26).
4. Add PI-EFC-X8 to the list of Excess Flow Check Valves associated with the Reactor Pressure Vessel. This valve was inadvertently omitted from the Technical Specification table; however, it is included in Surveillance Procedure 7.4.6.3.4.1 and, therefore, this change does not constitute a safety concern (pg. 6-25).
5. Add CAS-V-730 to section c. Manual Containment Isolation Valves and delete the listing of Containment Air Supply, CAS-V-453, from section d. Other Containment Isolation Valves. CAS-V-730 was added to the system via a PED and replaces CAS-V-453 as the outboard CIV for penetration X-82e (pgs. 6-26 and 6-31).
6. Add notes (g) and (b) after RCIC-V-742. This valve is a sample isolation valve on the head spray line and will be hydro tested with RCIC-V-13 and 66 (pg. 6-27).
7. Move RHR-V-124A, 124B, 125A and 125B from section d. (pg. 6-30) to section c. (pg. 6-27). These valves are now Manual Containment Isolation Valves.
8. Correct the typo on page 6-29 by changing RCIC-B-68 to read RCIC-V-68.
9. Delete RHR-RV-55A, B from page 6-29 and RHR-RV-95A, B from page 6-30. These valves have been removed from the system.
10. Add a new listing to section d. for Radiation Monitoring. PI-EFCX-72f and 73e are Containment Isolation Valves and were previously omitted from this table (pg. 6-32).
11. Correct the referenced Technical Specification in note (g) (pg. 6-32) from 4.4.3.2d to 4.4.3.2.2.

NOTE: The current revision of Surveillance Procedure 7.4.6.1.2.4 for Local Leak Testing takes into account the changes made in steps 5, 6, and 10; therefore, these changes do not constitute a safety concern.

12. Correct TIP system containment isolation valve (CIV) EPN's (pg. 6-22 and 6-32) per DCP 84-1672-0A. Delete TIP-V-11 from the Table (pg. 6-22); this valve is not a CIV. TIP-V-6, the N₂ purge supply check valve, is the CIV. Add note e) to indicate exemption from Type C leak rate testing for the TIP shear valves as previously approved in FSAR Table 6.2-16.
13. Add note j) to Table 3.6.3-1 for RCIC-V-8, RCIC-V-63, RWCU-V-1, and RWCU-V-4 (see pgs. 6-23, 6-24, and 6-32).
14. Delete any maximum isolation times listed for valves in section d. Other Containment Isolation Valves of Table 3.6.3-1 in Technical Specification (replace with "NA"). These valves do not receive automatic isolation signals and the given stroke times do not represent stroke times required to meet containment isolation criteria as described in section 6.2.4 of the WNP-2 FSAR. Individual justifications are as follows:

MSLC-V-3A, B, C, D	Main steam leakage control isolation valves, these valves are normally closed. System is initiated after a LOCA, The valves auto-isolate on high leakage conditions.
RFW-V-65A, B	Feedwater isolation valves, auto-isolation is not desirable since the feedwater system is potentially a significant source of makeup. Feedwater check valves on either side of the containment provide immediate leak isolation, if required.
RWCU-V-40	RWCU vessel return isolation valve, can be manually closed upon indication that the RWCU pumps have tripped. The feedwater check valves provide immediate isolation.
HPCS-V-4, 15 LPCS-V-1, 5 RHR-V-16A, B RHR-V-17A, B RHR-V-42A, B, C RHR-V-4A, B, C	These valves are the ECCS and drywell spray suction and discharge isolation valves. ECCS operation is essential during a LOCA; therefore there are no automatic isolation signals.
HPCS-V-12 LPCS-FCV-11. RHR-FCV-64A, B, C RCIC-V-19	These valves are the RCIC and ECCS minimum flow valves, they auto open on pump running and low flow. They are shut at all other times.
RCIC-V-68	The RCIC steam exhaust valve, normally open at all times. Should a leak occur, it would be detected and alarmed by the RCIC high temperature leak detection circuit.
RCIC-V-69	The RCIC vacuum pump discharge valve, normally open at all times. Can be remotely closed upon indication that vacuum can no longer be maintained in the barometric condenser.



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RCIC-V-13	The RCIC injection valve, only open during system operation. Injection line check valves on either side of containment provide immediate isolation, if required. Auto closes when the turbine throttle valve is closed following a turbine trip.
RCIC-V-31	The RCIC suppression pool suction valve, open only during system operation. Can be closed remotely by the operator on indication that the system is no longer operating.
RHR-V-73A, B	RHR heat exchanger vent valves, normally closed. Only opened for system vent and fill.
RHR-V-134A, B	CAC to RHR drain valves, normally closed. Only opened during CAC operation.
CAC-V-2, 15, 11, 6, 4 CAC-FCV-1A, B, 2A, B CAC-V-8, 13, 17 CAC-FCV-3A, B, 4A, B	CAC isolation valves, normally closed. System is only placed in operation if hydrogen is detected post-LOCA.
RRC-V-16A, B	RRC seal injection isolation valves. Can be remotely tripped upon indication that the CRD or RRC pumps have tripped. The isolation check valves provide immediate isolation.
CIA-V-20	Non ADS SRV and inboard MSIV supply isolation valve. Can be remote manually closed on indication of low supply pressure. The isolation check valve provides immediate isolation.
CIA-V-30A, B	ADS SRV supply isolation valves. Can be remote manually closed on indication of low supply pressure. The isolation check valves provide immediate isolation.
CSP-V-5, 6, 9	The 4 second closing time limit results from a requirement given in Branch Technical Position CSB 6-4, Containment Purging During Normal Plant Operations, that purge system isolation valve closure times, including instrumentation delays, should not exceed five seconds. However, these valves are butterfly vacuum breakers, not purge system isolation valves. They only open when a vacuum exists in primary containment. They are normally closed during purging operations.

15. Add FPC-V-149 to Table 3.6.3-1 of Technical Specification (pg. 6-22) per DCP 85-008-0A and 85-008-1C.

