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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 Specs to delete ref to H202 analyzer precise gas concentrations in Table 4.3.7.5-1. Fee paid.

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

G02-86-224
March 14, 1986

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attn: 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
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
FOR H_2O_2 ANALYZERS (SECTION 4.3.7.5)

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 change is requested:

> Modify Table 4.3.7.5-1, Table Notations, for Accident Monitoring Instrumentation Surveillance Requirements (as attached).

License Condition 16, Attachment 2, item 3(a) to the WNP-2 Operating License states that

> "The licensee shall implement (installation or upgrade) requirements of R.G. 1.97 Rev. 2 with the exception of flux monitoring prior to startup following the first refueling outage."

As a result, during the Spring 1986 outage the Supply System will be replacing, in total, the present H_2O_2 Analyzers with a qualified replacement. The replacement system is designed so that precise sample gas concentrations as described in the present technical specification are not necessary to ensure coverage of the required instrument range. Accordingly, as supported below, reference to precise sample gas concentrations should be removed from the subject technical specifications.

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REQUEST FOR AMENDMENT TO TECH. SPECS. FOR H_2O_2 ANALYZERS (SECTION 4.3.7.5)

The new H_2O_2 monitoring system has a micro-processor that automatically compensates for containment pressure and temperature and is used to calibrate the H_2O_2 monitoring system. An actual Technical Specification restraint is no longer required on the calibration gas concentrations since changes in H_2 or O_2 calibration gas concentrations are entered into the micro-processor and directly compared to the compensated output signals of the H_2 and O_2 sensors during calibrations.

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 deletion of a precisely specified gas concentration does not detract from the ability of the new H_2O_2 analyzers (Exosensor) to cover the required instrument range. The new system's capabilities, without a precisely specified gas concentration in the technical specification, remain equivalent to the present system. Therefore, no increase in probability or consequences of a previously analyzed accident is credible.

2) Create the possibility of a new or different kind of accident because no function or features of the present system will be lost in calibrating the new system without the precise gas concentrations specified in the technical specifications. Hence, no new or different kind of accident is conceivable.

3) Involve a significant reduction in a safety margin because the new system without precisely specified gas concentrations has the same capabilities of the presently installed system. Hence, no reduction in safety margins is possible.

The new system represents a marked improvement over the presently installed system. The sample points and return lines have been relocated eliminating sample return problems and increasing the accuracy and confidence of sample results. Remote calibration at any time is a new feature over the present system. Additionally, the new system utilizes hydrogen/argon calibration gases instead of the more flammable hydrogen/nitrogen calibration gases used by the present system. The micro-processor utilized with the new system eliminates the need for precise gas concentrations, provides greater flexibility, and with the design features discussed above, provides a significant increase in system operability and overall safety.

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

REQUEST FOR AMENDMENT TO TECH. SPECS FOR H_2O_2 ANALYZERS (SECTION 4.3.7.5)

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

Very truly yours,

GC Sorensen

G. C. Sorensen, Manager
Regulatory Programs

PLP/LDS/tmh
Attachments

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

STATE OF WASHINGTON)
)
County of Benton)

Subject: Request for TS Amendment
H_2O_2 Analyzers (Section 4.3.7.5)

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 14 MARCH, 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 14th day of March, 1986.

Shirley A. Reese
Notary Public in and for the
State of Washington

Residing at Kennewick