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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  
 Office of Nuclear Reactor Regulation, Director (post 851125  
 ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Application for amend to License NPF-21, changing Tech Spec  
 3/4.1.5, Figures 3.1.5-1 & 3.1.5-2 re standby liquid control  
 sys to reflect increase in sodium pentaborate decahydrate  
 solution concentrations. Fee paid.

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1. The purpose of this document is to provide a comprehensive overview of the current status of the project and to identify the key areas for improvement. The document is intended for use by all project team members and is to be kept confidential.

2. The project has been successful in achieving its primary objectives, but there are several areas where further work is required. The most significant areas for improvement are in the areas of communication, resource management, and risk management.

3. The project team has identified several key risks that could impact the success of the project. These risks are being monitored closely and mitigation plans are being developed to minimize their impact.

Item	Description	Status	Priority
1	Project Plan	Complete	High
2	Resource Allocation	In Progress	Medium
3	Risk Management	Not Started	Low
4	Communication	In Progress	Medium
5	Documentation	Complete	Low
6	Testing	In Progress	Medium
7	Deployment	Not Started	High
8	Post-Deployment	Not Started	Low

4. The project team is committed to ensuring the success of the project and is working closely with all stakeholders to address the identified areas for improvement. The project is on track and is expected to be completed by the end of the year.

5. The project team is grateful for the support and feedback provided by all stakeholders and is committed to continuing to improve the project and the organization.

## Washington Public Power Supply System

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

January 6, 1987  
G02-87-002

Docket No. 50-397

Director of Nuclear Reactor Regulation  
Attn: 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 3/4.1.5, FIGURE 3.1.5-1 AND  
3.1.5-2, STANDBY LIQUID CONTROL SYSTEM

- References:
- 1) Letter, G02-86-565, G. C. Sorensen (SS) to E. G. Adensam (NRC), "Anticipated Transient Without Scram Implementation Schedule", dated June 19, 1986
  - 2) Letter, G02-85-718, G. C. Sorensen (SS) to W. R. Butler (NRC), Same Subject, dated October 14, 1985
  - 3) NEDE-31096P, "Anticipated Transient Without Scram, Response to NRC ATWS Rule 10CFR50.62", dated December 1985
  - 4) Letter, G. Lainis (NRC) to T. A. Pickens (BWR Owners' Group), "Acceptance for Referencing of Licensing Topical Report NEDE-31096P; Anticipated Transient Without Scram; Response to NRC ATWS Rule, 10CFR50.62", dated October 21, 1986

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 Supply System is requesting an increase to the sodium pentaborate decahydrate solution concentrations as specified in 3/4.1.5, Standby Liquid Control System (SLC) Surveillance Requirements. As committed to in Reference 2, the Supply System will be upgrading the SLC System at the next refueling outage in order to comply with the ATWS rule requirements 10CFR50.62(c), 4. The ATWS requirements are that the SLC System be capable of injecting at a minimum flow capacity and boron content equivalent in control capacity to 86 gpm of 13 weight percent sodium pentaborate solution. Accordingly, Section 3/4.1.5 of the WNP-2 Technical Specifications must be changed as attached.

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E. G. Adensam

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REQUEST FOR AMEND. TO TS - STANDBY LIQUID CONTROL SYSTEM

This request is submitted in anticipation of the work being started and completed during the Spring 1987 refueling outage. The intent is to allow adequate time for Staff review and approval and arrange for release of the changed specification upon completion of the modification.

The Supply System has been utilizing the BWR Owners' Group Licensing Topical Report (Reference 3) in determining equivalency to satisfy the requirements of 10CFR50.62(c), 4 and ensure reliability of operation. The modifications of the WNP-2 SLC System design are in compliance with the recommendations from the referenced Topical Report which provides a justification for determining equivalency and design basis requirements. The Licensing Topical Report has been reviewed by the NRC and an SER issued (see Reference 4).

The SLC System design modification at WNP-2 will result in increased injection rate by simultaneous operation of both SLC pumps and increase of the sodium pentaborate decahydrate concentration. The higher concentration levels proposed by the changes to Figure 3.1.5-2 are necessary to meet the equivalency requirements at the minimum flow rate presently allowed by the Technical Specifications. Increasing the sodium pentaborate decahydrate concentration and provision for two-pump operation are planned for implementation during the Spring 1987 refueling outage.

The Supply System has reviewed this request per 10CFR50.59 and 50.92 and has determined that no unreviewed safety questions or significant hazards will result relative to the proposed change because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the SLC sodium pentaborate solution requirement accepted by the NRC for flow and concentration equivalency exceeds the values previously presented in the Technical Specification and the change does not affect the possibility of an ATWS.
- 2) Create the possibility of a new or different kind of accident from an accident previously evaluated because the increase in the SLC tank solution concentration provides sufficient boron to achieve a cold plant shutdown and the temperature limits are increased to accommodate the maximum allowable concentrations to preclude solution precipitation.



E. G. Adensam

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REQUEST FOR AMEND. TO TS - STANDBY LIQUID CONTROL SYSTEM

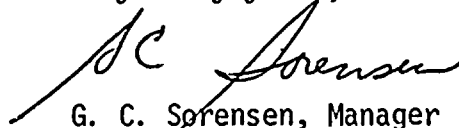
- 3) Involve a significant reduction in a margin of safety because a higher minimum SLC tank solution concentration actually increases the boron available to achieve a cold shutdown over the entire range of permissible tank volumes.

This change has been reviewed and approved by the WNP-2 Plant Operations Committee and the Supply System Corporate Nuclear Safety Review Board.

In accordance with 10CFR170.21, an application fee of One hundred fifty dollars (\$150.00) accompanies this request. In accordance with 10CFR 50.91, the State of Washington has been provided a copy of this letter.

If you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

SIS/DLW/tmh  
Attachments

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



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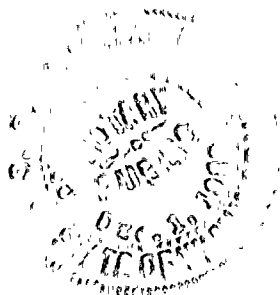
Subject: Tech. Spec. Amendment  
3/4.1.5, Fig. 3.1.5-1  
3.1.5-2  
Standby liquid  
Control System

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.

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 16<sup>th</sup> day of JAN., 1987.



S. R. Michaels  
Notary Public in and for the  
State of Washington

Residing at Richtonville, WA  
Dec. 89

