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SUBJECT: Application for amend to License NPF-21, modifying License condition 2. C. (14) to incorporate std fire protection license condition & removing fire protection Tech Specs, per Generic Ltr 86-10. Fee paid.

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

February 10, 1987
G02-87-046

Docket No. 50-397

Nuclear Regulatory Commission
Attn: Document Control Desk
Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT TO LICENSE CONDITION 2.C. (14), AND REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM TECHNICAL SPECIFICATIONS

Reference: Generic Letter 86-10 dated April 24, 1986, Implementation of Fire Protection Requirements

In its Generic Letter 86-10 dated April 24, 1986, the Nuclear Regulatory Commission (NRC or Commission) stated that a standard license condition, "requiring licensees to comply with the provisions of the fire protection program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements." The Commission encouraged licensees, where necessary, to amend their licenses to incorporate the "standard license condition." (Generic Letter 86-10 at p. 4.) In accordance with the Commission's request, the Supply System hereby requests an amendment to the WNP-2 license and associated Technical Specifications. Specifically, as discussed more fully below, the Supply System requests that 1) License Condition 2.C.(14) pertaining to the WNP-2 Fire Protection requirements be modified to incorporate the standard fire protection license condition and 2) fire protection Technical Specifications for WNP-2 be removed.

In Generic Letter 86-10, the Commission stated that as a prerequisite for application for the standard fire protection license condition and removal of related technical specifications, a licensee must incorporate into its FSAR its fire protection program, including the fire hazards analysis and major commitments that form the basis for the fire protection program. The Supply System has incorporated the fire protection program into its FSAR. For the purpose of the requested standard fire protection license condition, the WNP-2 fire protection program consists of:

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- Section 9.5.1 of the WNP-2 FSAR up to and including Amendment 37[1] provided to the Staff for review on September 22, 1986.

Having complied with the Commission's prerequisites set forth in Generic Letter 86-10 for application of the standard fire protection license condition and deletion of fire protection technical specifications, the Supply System hereby requests that License Condition 2.C.(14) of the WNP-2 Operating License be revised to read as follows:

Fire Protection

The Supply System shall implement and maintain in effect all provisions of the approved fire protection program as described in their submittal dated February 1987 (Subject: Nuclear Plant No. 2, Operating License NPF-21, Request for Amendment to License Condition 2.C.(14) and Removal of Fire Protection Requirements from Technical Specifications) and as approved in the SER dated _____(and supplements dated), subject to the following provision:

> The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

As the Commission provided in Generic Letter 86-10, the Supply System can make changes to its fire protection program as described in this letter without Staff approval as long as the changes 1) do not otherwise involve a change to a license condition or a technical specification, 2) do not place WNP-2 in a position where it would not be able to achieve and maintain safe shutdown in the event of a fire and 3) do not constitute an unreviewed safety question as defined by 10CFR 50.59. As with the other changes implemented under 10CFR 50.59, the Supply System will maintain, in auditable form, a current record of all such changes, and will make these records available to NRC inspectors upon request. All changes to the fire protection program as described in this letter will be reported annually to the Director of the Office of Nuclear Reactor Regulation, along with the FSAR revisions required by 10CFR 50.71(e). Further, as provided by the Commission in Generic Letter 86-10, temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented where necessary.

In addition to the request for amendment of License Condition 2.C.(14), in accord with the provisions of Generic Letter 86-10, the Supply System requests that the attached changes to the WNP-2 Technical Specifications relating to fire protection be approved.

[1]The Supply System reiterates its request that FSAR Amendment 37 inclusive be reviewed by the Staff and a SER submitted to document Staff approval.

REQUEST FOR AMENDMENT TO LICENSE CONDITION 2.C.(14) AND REMOVAL OF FIRE PROTECTION REQUIREMENTS FROM TECHNICAL SPECIFICATIONS

The Supply System has reviewed this request pursuant to 10CFR 50.59, 50.92 and Part 51 and has determined that the request will not have an adverse impact upon the environment, and, 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 changes proposed would not adversely impact the existing fire protection program.

2) Create the possibility of a new or different kind of accident than previously evaluated because the changes proposed would not adversely affect the operation or function of any safety-related equipment.

3) Involve a significant reduction in a margin of safety because no change to the basis of the fire hazards analysis is being proposed.

The Supply System requests that this amendment be processed on an expedited basis.

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 10CFR 50.170.12(c), 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.

Should you have any further questions, please contact Mr. P. L. Powell, Manger, WNP-2 Licensing.

Sincerely,

G. C. Sorensen, Manager
Regulatory Programs

bk

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: Condition 2.C(14)

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.

GC 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 10th day of February, 1987.

S.R. Michaud

Notary Public in and for the
State of Washington

Residing at Richland, WA.
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