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 RECIP. NAME RECIPIENT AFFILIATION  
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-21, revising Tech Specs  
 re control rod hydraulic control unit accumulator nitrogen  
 low pressure alarm to provide adequate trip point setting  
 allowance to account for downward instrument drift. 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 9, 1987  
G02-87-0043

Docket No. 50-397

U.S. 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 TECHNICAL SPECIFICATION 4.1.3.5 - CONTROL ROD  
SCRAM ACCUMULATORS

Reference: General Electric Service Information Letter (SIL)  
No. 429, dated August 9, 1985

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System requests an amendment to the WNP-2 Technical Specifications (see attached). As recommended by the Reference (also attached), the Supply System is requesting to revise the control rod hydraulic control unit (HCU) accumulator nitrogen low pressure alarm to provide adequate trip point setting allowance to account for the downward instrument drift trends observed since plant startup.

The subject Technical Specification requires that the low pressure alarms be set at 940 +30, -0 psig on decreasing pressure. This 30 psig band for the low pressure alarm setpoint may not always provide sufficient instrument drift margin for the installed pressure switches. As a result, HCU nitrogen pressures less than 940 psig may be experienced. The Supply System is requesting that the Technical Specification be amended to state that the low pressure alarms be set at "equal to or greater than 940 psig on decreasing pressure". The switches may then be set to trip at a higher value to allow for drift.

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REQUEST FOR AMEND. TO TS 4.1.3.5 - CONTROL ROD SCRAM ACCUMULATORS

The Supply System has reviewed this request per 10 CFR 50.59 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 low pressure alarm setpoint will not be set below the present Technical Specification allowed value and may, in fact, be set at a more conservative position.
- 2) Create the possibility of a new or different kind of accident from an accident previously evaluated because the alarm setpoint may be set in a more conservative direction.
- 3) Involve a significant reduction in a margin of safety because a more conservative low pressure alarm setpoint actually increases the margin of safety.

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 10 CFR 170.21, 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.

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

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

tmh  
Attachments

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