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 SORESEN, G. C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-21, modifying time period when reg guide 1.97, rev 2 is required to be implemented for suppression pool level monitoring from prior to startup following second fuel outage. Fee paid.

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 TITLE: OR/Licensing Submittal: Suppl 1 to NUREG-0737(Generic Ltr 82-33)

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1. The first of these is the fact that the Commission has not yet received any information from the Government of the United States regarding the results of its investigation of the activities of the American Friends Service Committee in the Philippines. The Commission is deeply concerned that the Government of the United States should be able to provide the Commission with the information it needs to carry out its mandate.

[illegible]

1. The following information was obtained from the file of the Bureau of the Census, Washington, D. C., on the subject of the above-named individual:

[illegible]

Washington Public Power Supply System

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

G02-87-0090
March 12, 1987

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 OPERATING LICENSE, LICENSE CONDITION 16,
ATTACHMENT 2, ITEM 3(a)

Reference: 1) Letter, G02-86-408, GC Sorensen (SS) to
EG Adensam (NRC), same subject, dated 5/7/86
2) Letter, G02-86-282, GC Sorensen (SS) to
EG Adensam (NRC), same subject, dated 3/28/86

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 Operating License. This proposed amendment, if approved, will modify the subject license condition to extend the time period when Regulatory Guide 1.97, Revision 2 is required to be implemented for suppression pool level monitoring from prior to startup following the second refueling outage to prior to startup following the third refueling outage.

As related in Reference 2), the Supply System was unable to demonstrate that the originally installed suppression pool level monitoring system met the accuracy requirements for this equipment. This failure to demonstrate accuracy resulted in pursuit of an alternate design. The Supply System is currently expediting testing on a continuous RTD design, but fabrication difficulties have caused schedule slippage and also resulted in failed qualification specimen tests. The finalization of system testing is proceeding on an expedited basis; however, the manufacturing lead time is beyond our control, and impacts the overall installation schedule. Depending on when successful completion of

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testing is accomplished, shipment of materials and completion of installation of the new system may not be possible within the present refueling outage schedule. This may necessitate an installation delay until the third refueling outage. Hence, the Supply System is requesting this license condition change now so that should testing of the system and subsequent installation not be possible, adequate time is provided for processing the request. Should successful testing be accomplished so that timely installation is possible, this request will be retracted. Additionally, installation of supporting portions of the new design is intended to be accomplished during the present refueling outage within the constraint of maintenance of operability of the currently installed system.

Reference 1) demonstrated that due to EQ test results and with the use of revised emergency procedures, reliance on the existing system for an interim period was not considered a significant hazard and continued operation was justified. The justification for continued operation provided in that reference continues to be applicable and is referenced here to support operation to the third refueling outage.

The Supply System has evaluated this amendment per 10 CFR 50.59 and 50.92 and determined that the requested amendment does not represent an unreviewed safety question or significant hazard because it does not:

- 1) involve a significant increase in the probability or consequences of an accident previously evaluated because the instruments perform no automatic mitigating function. The parameter sensed, however, is relied upon to mitigate the consequences of an accident and is relied upon in the plant emergency procedures to determine actions necessary to maintain primary containment integrity. Other containment parameters related to suppression pool level (temperature, pressure) are incorporated into symptomatic emergency operating procedures to support accident mitigation. Or,
- 2) create the possibility of a new or different kind of accident from any accident previously evaluated because the alternate methods to be employed are considered sufficiently accurate and reliable to adequately direct actions necessary to respond as required by the emergency procedures. Or,
- 3) involve a significant reduction in a margin of safety because no protective functions are affected.

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REQUEST FOR AMEND. TO OPERATING LICENSE, LIC. COND. 16, ATTACH. 2,
ITEM 3(a)

Based on the above, we request that the subject license condition be revised to read as follows:

3. Regulatory Guide 1.97, Revision 2 Compliance

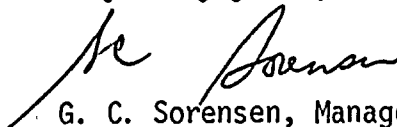
- (c) The licensee shall implement (install and have operational) a wide range suppression pool level monitoring system which satisfies the Category 1 equipment specifications in accordance with Regulatory Guide 1.97, Revision 2, prior to startup following the third refueling outage.

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.

Should you require any further information or assistance to aid in evaluating this request, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP/bk

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

STATE OF WASHINGTON)
)
County of Benton)

Subject: License Condition 16
Item 3 (a)

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 12th day of March, 1987.

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

Residing at Richland, WA.
Dec "89"



1. The first part of the document is a list of names and addresses of the members of the committee.

2. The second part of the document is a list of names and addresses of the members of the committee.

3. The third part of the document is a list of names and addresses of the members of the committee.

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5. The fifth part of the document is a list of names and addresses of the members of the committee.

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