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 Document Control Branch (Document Control Desk)

SUBJECT: Requests for exemption to App J Type C leak rate test  
 Schedule, one time. Advises that proposed exemption within  
 intent of App J, not pose undue risk to public health &  
 safety & allows more efficient allocation of resources.

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 TITLE: OR Submittal: Append J Containment Leak Rate Testing

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1. The first part of the document discusses the importance of maintaining accurate records of all transactions. It emphasizes that proper record-keeping is essential for the integrity of the financial system and for the ability to detect and prevent fraud.

2. The second part of the document outlines the specific procedures for recording transactions. It details the steps involved in the accounting process, from the initial entry of data into the system to the final review and approval of the records.

3. The third part of the document addresses the role of the auditor in ensuring the accuracy and reliability of the financial records. It describes the various techniques used by auditors to verify the information and to identify any potential discrepancies or errors.

4. The fourth part of the document discusses the importance of internal controls in the financial system. It explains how these controls are designed to prevent and detect errors and fraud, and how they are integrated into the overall accounting process.

5. The fifth part of the document provides a summary of the key points discussed in the previous sections. It reiterates the importance of accurate record-keeping, proper accounting procedures, effective auditing, and strong internal controls.

6. The sixth part of the document discusses the importance of transparency and accountability in the financial system. It explains how these principles are essential for building trust and confidence among stakeholders, and how they are achieved through the implementation of the various controls and procedures described in the document.

7. The seventh part of the document provides a conclusion and a call to action. It encourages all members of the organization to take responsibility for their role in maintaining the integrity of the financial system, and to work together to ensure the highest standards of accuracy and reliability.

8. The eighth part of the document is a list of references and a bibliography. It includes a list of the sources used in the research and development of the document, as well as a list of other relevant documents and publications.

9. The ninth part of the document is a list of appendices. It includes a list of the various forms and documents used in the accounting process, as well as a list of other relevant documents and publications.

10. The tenth part of the document is a list of footnotes. It includes a list of the various footnotes used in the document, as well as a list of other relevant documents and publications.

## Washington Public Power Supply System

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April 7, 1987  
G02-87-120

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  
EXEMPTION TO APPENDIX J TYPE C LEAK RATE  
TEST SCHEDULE, ONE TIME

- References:
- 1) Letter, G02-86-119, G. C. Sorensen (SS) to E. G. Adensam (NRC), "Request for Exemption to Appendix J Type B & C Leak Rate Test Schedules and Related Technical Specification Amendment Change Section 4.6.1.2.d", dated January 31, 1986
  - 2) Letter, G02-87-004, G. C. Sorensen (SS) to E. G. Adensam (NRC), "Request for Exemption/Technical Specification Change (Appendix J and Section 4.6.1.2.d)", dated January 9, 1987
  - 3) Letter, G02-87-47, G. C. Sorensen (SS) to NRC, "Request for Exemption/Technical Specification Change - Appendix J and Section 4.6.1.2.d, Supplemental Information", dated February 11, 1987
  - 4) Letter, G02-87-0074, G. C. Sorensen (SS) to NRC, "Request for Exemption/Technical Specification Change Appendix J and Section 4.6.1.2.d, Clarification", dated March 4, 1987

The Type C leak rate testing schedule as prescribed by Appendix J, Section III D states:

"Type C tests shall be performed during each reactor shutdown for refueling but in no case at intervals greater than 2 years."

The related technical specification states that "Type B and C tests shall be conducted at intervals no greater than 24 months . . .", and makes no reference to refueling outages.

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Request for Exemption to Appendix J Type C Leak Rate Test Schedule, One Time

Reference 1 requested that an exemption per 10 CFR 50.12(a) to Appendix J be granted to allow Type C testing in accordance with the technical specifications and further requested a technical specification change to extend the two year interval on the basis of the Supply System's unique refueling schedule. The subject of this letter is strictly a request for a schedular exemption to the Type C schedule prescribed in Appendix J, "each refueling outage".\*

References 2, 3 and 4 provided the Staff the details of a program to support the Reference 1 requests. As related in numerous phone conversations between Messrs. J. Bradfute (NRC) and P. Powell (SS), the Staff has written a safety evaluation report (SER) favorable to those requests. However, as related in those conversations, it appears the program details as described in the SER may be inconsistent with the details provided in References 2, 3, and 4. Specifically;

- o as related by phone, the SER describes the licensee as proposing to limit leakage for Type 3 penetrations to 50 SCCM per penetration. To be consistent with the program, this should be reflected as an "acceptance leakage limit criteria".
- o as related by phone, the SER states that Main Steam Isolation Valves would be tested at each refueling. The WNP-2 technical specifications state an 18 month frequency;
- o As discussed, the SER apparently states that whenever the "as-left" leakage exceeds .5 La barriers would be repaired to bring the leakage "as-left" to below .5 La. Reference 4 provided the following:
  - "a) Following each operating cycle refueling outage and prior to restart, the total as-left Type B & C leakage shall not exceed 0.5 La.
  - b) Additionally, if at any time during an operating cycle the as-left leakage total following maintenance exceeds 0.5 La, all Type B & C containment penetrations shall be tested during the next shutdown for refueling."

There appear to be significant differences between the WNP-2 proposed program and that described in the SER, this has prompted the Supply System to make the subject request.

\* The Supply System recognizes the difference between the Appendix J statement and the WNP-2 technical specifications and exercising an abundance of caution considers that, should the staff determine that the Appendix J statement prevails over the technical specifications, this letter embodies the subject exemption request. If, however, the Staff concurs with the Supply System that the technical specifications would prevail then this exemption request would be unnecessary. In any event, by filing this request for exemption, the Supply System does not relinquish the position that based on the technical specifications the Supply System is not required to perform Type C testing each refueling outage.



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Request for Exemption to Appendix J Type C Leak Rate Test Schedule, One Time

As discussed in Reference 1, Type C testing consumes the majority of resources and accounts for the largest percentage of exposure during Type B & C testing. It was anticipated that the Reference 1 requests would be in place in time to support the forthcoming outage commencing April 13, 1987. As a result, the resources allotted to Type C testing would be shifted and the attendant exposure thereby avoided. Absent this approval, all Type C testing has been scheduled for this outage. Obviously, the ability to access a system for leak testing must be coordinated with overall system availability and as systems go in and out of service during an outage, the "windows" available to conduct leakage testing shift. Hence, the impact of having to do complete Type C testing will be felt as early as April 17, 1987.

Accordingly, per 10 CFR 50.12(a) the Supply System requests a one-time exemption to 10 CFR Appendix J Section III D to allow Type C testing to be performed "during reactor shutdown but in no case at intervals greater than 2 years". It is our understanding that similar schedular exemptions of this type have been previously approved.

Concurrently, the Supply System requests that the Reference 1 requests and leak rate test program as described in References 2, 3, and 4 continue review and interaction with Supply System staff for approval such that a mutually acceptable program may be implemented in its entirety as soon as practical. The intent being that with a one time exemption, the program can be partially implemented in practice during the forthcoming outage and then with Staff approval completely implemented prior to the following outage.

With this exemption the Supply System intends to test approximately one half of the Type C valves this outage. Hence, within two cycles, all Type C valves would be tested. Additionally, the program described in References 2, 3, and 4 with attendant acceptance leakage criterion and reduced limits would be invoked and provide additional assurance that Type C testing at WNP-2 will meet the intent of Appendix J.

As discussed, the exemption concerns the discrepancy between Type C testing per Appendix J "each refueling outage" and the technical specification "at intervals no greater than 24 months". As related in previous correspondence, WNP-2 provides power to the Bonneville Power Administration (BPA) grid which is heavily dependent on hydroelectric power generation, in turn impacted by seasonal variation in snow pack and spring runoff in the Pacific Northwest. The spring runoff and subsequent increase in hydroelectric capacity is the most opportune time for WNP-2 refueling. Hence, the BPA directs the Supply System to refuel on a yearly basis, ideally coinciding with the peak period of hydroelectric capacity. Strict compliance with





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Request for Exemption to Appendix J Type C Leak Rate Test Schedule - One Time

Appendix J would then require complete Type C testing on a yearly basis which the Supply System considers to be beyond the original intent of Appendix J and which consumes far more resources than appropriate. Under the special circumstances dictated by the unique electrical generation profile discussed above, the Supply System must commit 100 percent more resources to meet the "each refueling outage" stipulation than the "two year" technical specification statement. The intent of the Appendix J statement "in no case at intervals greater than two years", was based on limiting the exposure of components to service conditions between tests to two years or less. The "each refueling outage" strictly applied to WNP-2 is beyond the original intent. A strict application is not necessary to achieve the purpose of the rule.

Granting the proposed exemption is in the best interest of the public. The committed resources beyond the intent of Appendix J could be better focused on other plant support tasks. The most recent Type B and C test leak rate program conducted at WNP-2 consumed in excess of 5,000 manhours which, using Industry labor rates, exceeds \$200,000. Type C testing consumes the majority of the resources used for leak rate testing. This resource could be better focused in support of other plant activities rather than utilized on excessive over testing required by strict compliance to Appendix J.

Additionally, the average exposure for Type B and C testing at BWRs is approximately 7 man-rem with Type C testing causing the majority of the exposure. Strict compliance with Appendix J and acceptance of this exposure is not in keeping with the WNP-2 as low as reasonably achievable (ALARA) program nor consistent with NRC policies on ALARA.

In summary, this proposed exemption is within the intent of Appendix J, does not pose an undue risk to public health and safety, allows more efficient allocation of resources and minimizes exposure in keeping with ALARA programs. The Supply System has determined that this exemption is authorized by law per 10 CFR 50.12.

In order to maximize resources and minimize exposures during the forthcoming outage, your prompt attention to this request is necessary. Should you have any further questions to aid in expediting this request, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

*R. B. Sorensen*

*for* G. C. Sorensen, Manager  
Regulatory Programs

PLP/tmh

cc: JO Bradfute - NRC  
C Eschels - EFSEC  
JB Martin - NRC RV

E Revelle - BPA  
NS Reynolds - BLCP&R  
NRC Site Inspector



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