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 SORENSEN, G. C. Washington Public Power Supply System:
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 Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-21, revising Tech Specs
 re isolation actuation instrumentation surveillance
 requirements, Table 4.3.2.1-1.

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Washington Public Power Supply System

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

June 1, 1987
G02-87-188

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 SPECIFICATIONS - ISOLATION ACTUATION
INSTRUMENTATION SURVEILLANCE REQUIREMENTS,
TABLE 4.3.2.1-1

- References: 1) Letter, G02-83-842, G. C. Sorensen (SS) to A. Schwencer (NRC), "Equipment Qualification Report for Safety-Related Equipment, September 1983", dated September 16, 1983
- 2) License Condition 2.C.(28), Equipment Qualification and License Amendment 8

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. This amendment is being submitted to recognize a change in the facility required by 10CFR50.49.

Prior to November 30, 1985 and in order to close J10-24 (Reference 1), the Supply System replaced four level indicating trip switches that provide the Reactor Water Level 2 containment isolation function, with Class 1E qualified instruments. The instruments' identification numbers were MS-LITS-26A through D. The new design configuration relies upon non-indicating level switches for the isolation function only. The subject Table by step 4.3.2.1-1, 2. c on page 3/4 3-22 requires that a channel check be performed once per shift during operational conditions 1, 2, 3, and #. This requirement is typical for those types of devices used that provide both a trip and indicating function or those devices that can be checked by derivation of the sensed parameter. Therefore, qualified level switches of the new design neither require nor support the performance of a channel check.

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REQUEST FOR AMEND. TO TS - ISOLATION ACTUATION INSTRUMENTATION
SURVEILLANCE REQUIREMENTS, TABLE 4.3.2:1-1

This amendment is merely an administrative deletion of a channel check that can no longer be performed, nor is it required. It has resulted from the proper implementation of a related license condition. For those devices designed to provide an indication function, other devices sharing a common reference leg to the trip units are channel checked in accordance with Table 4.3.7.5-1, Accident Monitoring Instrumentation Surveillance Requirements.

A review of this request per 10CFR50.59 and 50.92 has been conducted to conclude that no unreviewed safety questions or significant hazards will result relative to the change because it does not:

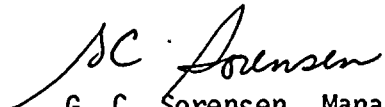
- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the instruments were approved for replacement by the NRC in License Amendment 8 as a recognized exception to the March 31, 1985 deadline imposed by License Condition 2.C.(28) and 10CFR50.49. The replacement devices are environmentally qualified and are specifically applied to perform the design bases function during the previously evaluated accident.
- 2) Create the possibility for an accident or malfunction of a different type than any previously evaluated because the logic design configuration is not altered, thus providing similar component failure protection and the devices used are environmentally qualified.
- 3) Involve a significant reduction in a margin of safety because the replacement required was recognized as an improvement over the existing components by replacement with qualified equipment and as such, represents an improvement in 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 10CFR50.170.12(c), an application fee of One hundred fifty dollars (\$150.00) accompanies this request. In accordance with 10CFR50.91, the State of Washington has been provided a copy of this letter.

Should you have any questions regarding this matter, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

HLA/MRW/tmh
Attachments

cc: C Eschels - EFSEC
JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC

DL Williams - BPA
NRC Site Inspector

STATE OF WASHINGTON)
)
County of Benton)

Subject: Isolation Actuation Instr.
Surveillance Requirements
Table 4.3.2.1-10

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 13th day of June, 1987.

S. R. Michael
Notary Public in and for the
State of Washington
Residing at Richland, WA
Dec. 89

