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SUBJECT: Requests temporary relief from Tech Spec Table 3.3.2-2, Item 1, "Main Steam Line Tunnel Temp - High," re increase in trip setpoint value from 150 F to 156 F. Tech Spec change to address "inviolate" definition concern will be submitted.

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September 1, 1987
G02-87-239

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 TEMPORARY RELIEF,
TECHNICAL SPECIFICATION TABLE 3.3.2-2

Reference: Letter, G02-85-238, G. C. Sorensen (SS) to A. Schwencer (NRC), "Setpoint Methodology for WNP-2", dated May 6, 1985

The subject Technical Specification Table item 1.d, Main Steam Line Tunnel Temperature - High, lists a trip setpoint value of 150°F. Upon issuance of the Technical Specifications, the value was utilized with the belief that the Bases statement Section 3/4.3.2: "operation with a trip set less conservative than its Trip Setpoint but within its allowable value is acceptable" provided guidance on the use of the value and application of an acceptable band around that value. Recently, temperatures in the main steam tunnel have approached the 150°F value to the extent that continued operation is in jeopardy. Using what was considered the trip setpoint acceptable range and what was felt to be guidance provided by the Bases, the trip setpoint has been readjusted within the acceptable range to 156°F. This value, per the setpoint methodology described in the reference, does ensure the allowable value, 170°F, will not be exceeded.

The Supply System has recently become aware that the Trip Setpoint as presented in the Technical Specification Tables are now to be viewed as inviolate limits which would preclude operation with a setpoint greater than 150°F. Resetting the setpoint to 150°F, given present conditions, would cause a group one isolation and reactor scram.

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Relief is requested on the bases that a Trip Setpoint at a value of 156°F will not create a significant hazards concern. A Technical Specification change will be submitted separately to address this programmatic concern under the "inviolate" definition. In the interim, the assertion that no significant hazards concern is presented is based on assuring that the allowable value is not exceeded. The original calculation performed to establish the leak detection high ambient temperatures analytical limit was based upon an equivalent 25 gpm condensate leak which resulted in 185°F tunnel temperature. The allowable value was an adjustment applied to the analytical limit accounting for 7 degrees of loop calibration uncertainty/inaccuracy and 6 degrees of additional margin combined by the square root of the sum of the squares method as described in Exhibit III of the reference letter. This would have produced an allowable value of 175.8°F but was conservatively reduced to 170°F as the submitted Technical Specification Allowable Value. A trip setpoint limit was arrived at by further reducing the allowable value for instrument drift of 6 degrees yielding 164°F. The 150°F trip setpoint was arrived at by consideration of long term plant life concrete degradation effects not attributable to instrumentation constraints and presenting no immediate significant hazards concern.

The 164°F value accounts for drift, total loop inaccuracy and calibration error providing a 21 degree margin to the analytical limit. The 6 degree margin to the Allowable Value accounts for the maximum expected instrumentation drift between required calibration frequencies of 18 months. Additionally, a 164°F value would put the setpoint in concurrence with other plants licensed after WNP-2 such as Susquehanna and Fermi whose trip setpoint differs from the Allowable Value by only the instrument drift margin of 7 and 6 degrees, respectively. Hence, operation at 156°F is well within margin. Given the amount of margin and the drift experienced to date (<3°F) no compensatory measures are deemed appropriate.

It should be noted that the Supply System did recognize steam tunnel cooling as a recurrent problem and took action during previous refueling outages to solve the problem. Insulation problems were corrected and a modification to provide cooler water to the steam tunnel heat exchangers was completed.

The circumstances producing the need for relief could not have been anticipated as the Supply System believed the actions taken would solve the problem and could not anticipate the Staff's interpretation of how to apply the trip setpoints in our instrumentation calibration program.

Based on the fact that the present setting, 156°F will not cause the Allowable Value to be exceeded and the assertion that no significant hazard is present by this value, present operation does not represent an undue risk to the health and safety of the public. Additionally, absent this relief, the WNP-2 plant will be placed in a position requiring plant shutdown.

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

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh

cc: C Eschels - EFSEC
G Knighton - NRC
JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA
NRC Site Inspector - 901A

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Request for Temporary Relief
TS Table 3.3.2-2

I, P. L. POWELL, being dully sworn, subscribe to and say that I am acting for 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.

DATE September 1, 1987

P. L. POWELL, Acting Manager
Regulatory Programs

On this day personally appeared before me P. L. POWELL to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 1st day of September, 1987.

Notary Public in and for the
State of Washington

Residing at Kennewick, WA

Expires Feb. 4, 1990