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 SORENSEN, 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, allowing single
 acoustic monitor to be inoperable until plant shuts down for
 next scheduled refueling outage or until first forced outage
 of sufficient duration to effect repair. Fee paid.

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Washington Public Power Supply System

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

October 13, 1987
G02-87-265

Docket No. 50-397

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 TABLE 3.3.7.5-1 (ACCIDENT
MONITORING INSTRUMENTATION) UNDER EMERGENCY CIRCUMSTANCES

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90, 2.101, and 50.91(a)(5), the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications on an emergency basis as provided for in the regulations. Specifically, the Supply System is requesting that a note be added to Table 3.3.7.5-1, Accident Monitoring Instrumentation, Instrument 10 (Safety/Relief Valve Position Indicators), to allow a single acoustic monitor to be inoperable until the plant shuts down for its next scheduled refueling outage or until the first forced outage of sufficient duration to effect repair, whichever occurs first.

Action 80.a for Technical Specification Table 3.3.7.5-1, Accident Monitoring Instrumentation, requires that the plant be shut down if an inoperable indicator channel is not restored to operable status within seven (7) days. Due to spurious actuations of the Acoustic Monitor (Safety/Relief Valve Position Indicator, Item 10) for MS-RV-2D, the Supply System entered the seven day LCO (Action 80.a) at 1604 hours on October 10, 1987. It has been determined that the plant will be required to be shut down and cooled down in order to repair/replace this acoustic monitor, unless an amendment is granted to allow the Supply System to continue to operate until either the next forced outage or the next scheduled outage (R-3).

The operability of the accident monitoring instrumentation is based on providing assurance that sufficient information is available on selected plant parameters (e.g., SRV position indication) to monitor and assess important variables following an accident. The intermittent loss of position indication for one of the eighteen (18) Safety/Relief Valves does not reduce the capability of the SRV to perform its intended function, nor does it prevent accurate determination of the position of the associated SRV.

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REQUEST FOR AMENDMENT TO TECH. SPEC. TABLE 3.3.7.5-1 (ACCIDENT MONITORING INSTRUMENTATION) UNDER EMERGENCY CIRCUMSTANCES

The following mitigating and compensatory factors provide assurance that the valve position is adequately monitored:

- 1) The incorrect indication is spurious by nature. After a short period of time, as well as immediately after being reset, the acoustic monitor reflects the accurate (i.e., correct) position of the SRV as further evidenced below. The acoustic monitoring channel will remain in operation as long as the indications are spurious. If the channel deteriorates to the point that it becomes a nuisance to Plant Operations, it will be disconnected. Previous testing performed on a channel exhibiting similar problems demonstrated the channel functioned during an SRV actuation.
- 2) Tail pipe temperature indication is monitored and recorded. An increase in temperature would indicate that the valve is open, and steam was entering the suppression pool via the tail pipe. This indication has remained within its normal operating range since the spurious action was identified. Channel checks of the temperature recorder are currently performed monthly per LCO 3/4.3.7.5. The tail pipe temperature surveillance will be performed daily instead of monthly. A design change is currently being expedited to add a control room annunciator to alarm on high tail pipe temperature (greater than 250°F). This annunciator will be activated by Friday, October 16, 1987, provided all parts are available for the modification. The staff will be apprised immediately if the change is not implementable by October 16, 1987. An annunciator response procedure will be written for the additional tail pipe temperature alarm that will also uniquely identify appropriate actions for MS-RV-2D.
- 3) Suppression Pool temperature indication is available, and is set to alarm at 85°F. An increase in suppression pool temperature would indicate an open SRV.
- 4) Suppression Pool level indication is available, and is set to alarm at +0.5"/-1" of Normal Level (466'3"). An increase in suppression pool level would indicate an open SRV.
- 5) Other plant parameters are affected by an SRV actuation and are available as confirmation. Examples are main turbine governor valve position indication change, generator output change, main turbine steam flow change and the resultant reactor pressure perturbation.

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Other indicators provide adequate feedback for ADS (reactor pressure) and SRV operation, and Alternate Shutdown Cooling operation (reactor pressure/temperature) if they are required. Additionally, MS-RV-2D is not controlled on either of the remote shutdown panels or an ADS valve.

As the spurious indication of this acoustic monitor has only recently been identified, it was not possible for the Supply System to anticipate this event and submit this request in a more timely manner. Based on the above, and the following no significant hazards consideration, the Supply System requests that the amendment to this Action Statement be granted until the next scheduled outage (no later than May 15, 1988), or the next forced outage of sufficient duration to effect the necessary repairs. (Interim operation for no longer than about 6 months.) Absent this amendment, the Supply System will be required to unnecessarily shut down by October 17, 1987.

The Supply System has evaluated this amendment per 10CFR50.59 and 50.92 and determined that it does not represent an unreviewed safety question or a significant hazard because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because FSAR Section 15.1.4 provides the analysis of an inadvertent opening of a Main Steam Safety/Relief Valve. This analysis assumes either a malfunction of the valve or an operator-initiated opening. The proposed change affects only the operability of the SRV position indication and does not affect automatic or manual actuation of the SRV. The spring set and ADS function is not affected by the position indication. MS-RV-2D is not an ADS valve or controlled from either of the remote shutdown panels (Appendix R). In addition, sufficient alternate means are available to determine the position of an SRV.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the proposal does not constitute a physical change to the plant, only recognition of a single component failure. The failure will not cause an incorrect assessment of valve position to occur as the same confirmatory devices relied upon are operable and sufficient to determine a not closed condition accurately.
- 3) Involve a significant reduction in a margin of safety because of the special attention that will be provided to diagnosing MS-RV-2D valve position and the acceptability of the remaining methods of determining an SRV closed position.

This amendment request has been reviewed and approved by the WNP-2 Plant Operations Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB).

In accordance with 10CFR170.21, 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.

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In summary, based on the assertion that no significant hazard is created by the subject relief and that remaining methods are available to satisfy the function of determining valve position, present operation does not represent an undue risk to the health and safety of the public. Additionally, absent this amendment, the WNP-2 plant will be required to 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
Attachments

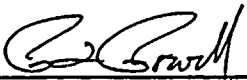
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STATE OF WASHINGTON)
)
COUNTY OF BENTON)

REQUEST FOR AMENDMENT TO
TECH SPEC TABLE 3.3.7.5-1
(ACCIDENT MONITORING INSTRUMENT-
Subject: ATION) UNDER EMERGENCY CIRCUM.

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.

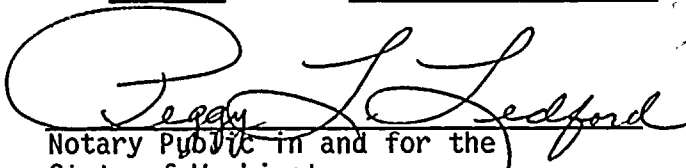
DATE 10/13, 1987



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 13th day of October, 1987.



Notary Public in and for the
State of Washington

Residing at Richland, Washington
Benton Co.

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