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 AUTH. NAME AUTHOR AFFILIATION
 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, changing Tech Spec
 Page 3/4 3-12 correcting inaccuracies/inconsistencies in
 Items 1. d, 1. c. 3 & 1. e. Fee paid.

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Washington Public Power Supply System

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November 19, 1987
G02-87-275

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 NO. NPF-21
ADMINISTRATIVE CHANGE TO
TECHNICAL SPECIFICATION TABLE 3.3.2-1

Reference: Letter, G02-87-240, GC Sorensen (SS) to USNRC,
"Request for Technical Specification Amendment
(Table 3.3.2-2)", dated September 1, 1987

While researching the Technical Specifications for the subject request for amendment, other errors were discovered in the same LCO. Specifically, on page 3/4 3-12, under Trip Function, item 1.d (Main Steam Line Tunnel Temperature-High, item 1.c.3, (Main Steam Line Flow-High), and item 1.e (Main Steam Line Tunnel Delta-Temperature-High) all contain inaccuracies/inconsistencies that are misleading and do not reflect actual plant design conditions.

Inside the steam tunnel, each of the four main steam lines is equipped with one temperature element (T/E) and one temperature switch (T/S), which provides the required indication, alarm for monitoring and isolation functions. There was never any requirement for more than one sensor per main steam line and the plant was designed from the outset to have only two channels per trip system with the two channels, one per line, used to develop a "one-out-of-two-twice" logic. In addition, the reference to note (d) in Table 3.3.2-1 is incorrect for items 1.d and 1.e. If the value of 2 represents the number of channels per trip system as the table heading indicates, the value 2 is correct. However, the table indicates 2 per line and includes the note d) which represents 4 channels per trip system. Note d) permits a channel to remain operable provided at least 2 of 4 detectors remain operable. The note therefore suggests more than two sensors per line are available. The reference to sensors per line is confusing and if removed would present the number of channels per trip system consistent with the other signals.

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Table 3.3.2-1, item 1.e also requires removal of note d). The mainstream line tunnel delta temperature-high trip system relies upon 2 channels per trip system as indicated, therefore note d) does not apply.

The main steam high flow trip system relies upon four sensors per line, each sensor providing an input to each of the "one-out-of-two-twice" trip systems such that any high flow condition in a single line will cause an isolation. Each trip system does have two channels, however the reference to "line" conflicts with the table heading and for consistency should be deleted.

This information was provided to the Staff in December, 1982 during the WNP-2 Technical Specification preparation process and was additionally missed by our review process.

The Supply System considers this to be an administrative action that is being taken to correct a longstanding error in the Technical Specifications. On that basis, we request that it be included along with the subject request for amendment under the broad discretionary authorities vested in the Director's office, in order to ensure that the Temporary Waiver granted on September 8, 1987 does not run out prior to our receipt of a permanent amendment.

Also as an additional item of clarification, in the first paragraph of the second page of the reference letter, we indicated that there might be a subsequent request to address the remainder of the trip set points, and that they be handled jointly if time permitted. This is to advise you that no subsequent requests will be forthcoming in the near future on this subject as we do not wish to delay the processing of our initial request.

A review of this request per 10CFR 50.59 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 any original evaluation would not have relied on there being more than one sensor per line as this was the original design. The existing system as presented in the WNP-2 FSAR section 7.3.1.1.2.b (Amendment 10) provides the required isolation/alarm functions that are necessary in the event of an accident or;
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because this is considered an administrative change only and there are no hardware or procedural changes being made as a result of this change or;
- 3) Involve a significant reduction in a margin of safety because no instrumentation setpoints are being altered, nor is the ability to react to these setpoints being modified.

As discussed above the Supply System considers that this change does not involve a significant hazards consideration nor does it involve a significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does it involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10CFR 51.22(c)(9) and therefore per 10CFR 51.22(b) an environmental assessment of the change is not required.

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 50.91, the State of Washington has been provided a copy of this letter.

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/bk
Attachments

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