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ACCESSION NBR:8802190145      DOC.DATE: 88/02/05      NOTARIZED: NO      DOCKET #  
FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe      05000397  
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SUBJECT: Application for amend to License NPF-21, requesting one-time only amend to Tech Spec 3.6.1.8.

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## Washington Public Power Supply System

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

February 5, 1988  
G02-88-034

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 A ONE  
TIME ONLY AMENDMENT TO TECHNICAL SPECIFICATION  
3.6.1.8 (DRYWELL AND SUPPRESSION CHAMBER PURGE  
SYSTEM) 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 the limit for purging of the containment through the Standby Gas Treatment System be increased from 90 hours to 100 hours.

The Limiting Condition for Operation in Technical Specification 3.6.1.8 requires that purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days (while in Operational Conditions 1,2 and 3).

On February 4, 1988, a shutdown occurred providing an opportunity to identify and fix leakage within the drywell. Prior to the February 4 shutdown and leakage repair activities, 70 hours of purging had been accumulated. At that time it was felt that the 90 hours would not be exceeded. However, to allow drywell access for identification and repair of leakage, approximately 16 additional hours of purging were performed increasing the total to date to 86 hours.

Since the leakage was felt to be a steam leak a decision was made to remain in hot shutdown to provide a higher pressure to more readily identify the leakage. Additionally remaining in hot shutdown avoided an additional thermal cycle on the vessel. The decision to stay in hot shutdown resulted in accumulating more purge hours during the maintenance activities than would have been accumulated had the activities been accomplished in cold shutdown.

*Approval w/ check 1/150*

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REQUEST FOR A ONE TIME ONLY AMENDMENT TO TS 3.6.1.8 (DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM) UNDER EMERGENCY CIRCUMSTANCES

As a result, 86 hours have been accumulated for the current period and there is certainty that the 90 hour limit will be exceeded. Present plans include a drywell entry at higher pressures to ensure that the steam leak repair has been adequate. In order to ensure personnel safety during this follow-up entry, purging will again be required and the 90 hour limit challenged. The reinerting prior to power operation will require four hours. Furthermore the purge system is used approximately two hours per month while the unit is at power to control containment oxygen. Additionally about 5 to 7 hours of purging will be required to bring the unit to cold shutdown if necessary again. For those reasons it is requested that the LCO be changed to allow 100 hours of purging during the current period. This request (attached) is submitted on a one time only basis.

The Supply System closely monitors the total hours purged and had recently, prior to the shutdown, made a determination that the remaining 20 hours (90-70) would be sufficient. The drywell leakage increase and prudent action to repair it during the shutdown could not be anticipated, hence the 20 hour margin is no longer sufficient. The Supply System had no way of anticipating the increased drywell leakage necessitating extended drywell entries in hot shutdown hence the submittal of this request under emergency circumstances.

Absent this request undue hardship in plant maneuvering limits would be encountered. Greater restrictions in power operation would be imposed. Cold shutdown would be required to be entered prior to any purging activities. Thereby causing plant shutdown more frequently and sooner than would normally occur and increased unnecessary thermal cycles. Hence an effective derating over the next operating period.

The Supply System considers the requested additional 10 hours to be sufficient to allow the planned entry and containment reinerting discussed above, plus approximately two hours per month to limit oxygen concentration per Technical Specification 3.6.6.2 and allow one more evolution to reach cold shutdown prior to April 9, 1988 at which time the requested one time only request is not required.

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The Supply System has evaluated this amendment per 10 CFR 50.59 and 50.92 and determined that it does not represent an unreviewed safety question or a significant hazard relative to containment system integrity. Further, the proposed change will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. No physical changes are being made to the Plant. Primary containment integrity is maintained by the operable isolation function of the valves and is not affected by this amendment. The probability of the postulated accident (a LOCA while purging through Standby Gas Treatment) occurring during the time period that these additional ten (10) hours are granted for is slightly less than the normal probability. The normal probability being 90 hours in 365 days which equates to 15 hours for the remaining 62 days before the clock is reset on April 10, 1988. The additional 10 hours plus the remaining 4 hours would provide a total of 14 hours of venting and purging during this 62 day period.
- 2) Create the possibility of a new or different kind of accident than previously evaluated because no new designs or plant operating modes or the scope of the LCO are affected by this amendment.
- 3) Involve a significant reduction in a margin of safety because, as discussed in 1) above, the amendment does not affect primary containment integrity or increase the probability of occurrence.

The Supply System recognizes the concerns presented in Standard Review Plan (SRP) 6.1.4 and Branch Technical Position CSB 6-4. Since it is requested that only the 90 hour limit be increased by, in our judgment, an insignificant amount over the 365 day period, the 10 CFR 100 and ESF equipment analysis waived by SRP 6.2.4, Paragraph II.8 continues to apply for the 100 hour limit. It should also be recognized that no purge or venting operation using standby gas treatment is allowed by the technical specifications without both trains being operable per LCO 3/4.11.2.8 and purge system operation is further restricted using one train only (LCO 3/4.11.2.8). This ensures, despite the unlikely event of a LOCA occurring during purging or venting, that an operable standby gas treatment system is available post-LOCA. It is our belief that this requirement (LCO 3/4.11.2.8) formed an essential part of the bases for permitting a limited amount of operating time without the ESF evaluation referred to in SRP 6.2.4.

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As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for 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 Technical Specification change 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 10CFR 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  
RB Samworth - NRC  
DL Williams - BPA/399  
NRC Site Inspector - 901A

STATE OF WASHINGTON )  
 )  
COUNTY OF BENTON )

Drywell and Suppression  
Subject: Chamber Purge System

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 2/5, 1988

P. L. Powell  
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 5th day of February, 1987.

Bernice Karko  
Notary Public in and for the  
State of Washington

Residing at Benton County