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 SORESEN, 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, revising Tech Spec  
 to clarify that automatic isolation signals will be placed  
 in svc when control returned to control room.

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*Drawings To: Reg Files*

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## Washington Public Power Supply System

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

Docket No. 50-397

February 12, 1988  
G02-88-037

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 TECHNICAL SPECIFICATION AMENDMENT  
TABLE 3.3.2-1, ISOLATION ACTUATION INSTRUMENTATION  
(ADDITIONAL CONTROLS)

Reference: Letter, G02-88-002, GC Sorensen (SS) to NRC,  
same subject, dated January 5, 1988

On January 19, 1988, members of our respective organizations met in Bethesda to discuss the Supply System's approach to resolving the RHR-V-8/V-9 issue (see Reference). During that meeting the NRC Staff expressed certain concerns about the possibility of inadvertent opening of RHR-V-8 when it was in the transferred "Emergency" position with the interlocks bypassed. The purpose of this letter is to provide additional actions to be taken by the Supply System to assuage those concerns.

To prevent inadvertent opening of both RHR pump suction valves RHR-V-8 and V-9 resulting from a control room fire the Supply System proposes the following:

1. During normal plant operation, (Operational Conditions 1, 2 and 3 when above 135 psig reactor steam dome pressure) the control of RHR valve V-8 will not be available in the main control room. The transfer switch located at the Alternate Remote Shutdown Panel will be placed in the "Emergency" position. With the valve closed and control transferred to the Alternate Remote Shutdown Panel, RHR-V-8 (closed during normal operation) cannot be inadvertently opened due to a fire in the main control room. This assures that the intersystem LOCA cannot occur from such a fire.

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*Pool  
11 Drawings  
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REQUEST FOR TS AMENDMENT TABLE 3.3.2-1, ISOLATION ACTUATION  
INSTRUMENTATION (ADDITIONAL CONTROLS)

2. With the transfer switch in the transferred "Emergency" position, the automatic isolation signals to RHR-V-8 are bypassed. These automatic isolation signals are: 1) reactor pressure above shutdown range permissive, 2) shutdown flow high, and 3) reactor vessel water level low. RHR-V-8 position indication will remain available continuously in the control room during normal operation through the use of the SPDS display. Upon return of control of RHR-V-8 to the control room during Shutdown Cooling Mode operation, the automatic isolation signals will be reinstated by returning the Alternate Remote Shutdown transfer switch to the "Normal" position. Refer to attached wiring diagram circled area at drawing zone A-3 for schematic representation.
3. To aid in the prevention of inadvertent operation of the valve from the local shutdown panel, a modification essentially identical to that incorporated by River Bend (approved by the NRC) will be included. The modification consists of the addition of a key-locked, two position (Enable-Disable), maintained contact control switch. A contact from this switch will be wired in series with the Alternate Remote Shutdown Panel RHR-V-8 control switch ("Open" control contact). Thus, in order to actuate valve V-8, the key (controlled by Administrative Procedure 1.3.23) must be acquired, the key-locked switch moved from the "Disable" to the "Enable" position, and the valve control switch moved from the "Close" to the "Open" position. Refer to the attached electrical wiring diagram circled area at drawing zone F-6 for a schematic representation.

As a result of the above changes, it will also be necessary for the Supply System to add this new step to the Remote Shutdown Procedures (PPM 4.12.1.1 and 4.12.1.2).

The Staff also requested that the proposed changes to the Technical Specifications (see Reference) be revised to clarify that the automatic isolation signals will be placed in service when control is returned to the control room. This has been accomplished by providing some clarification to the previously submitted material (attached).

The Supply System has reviewed the addition of the key-lock switch in conjunction with the previously evaluated transfer of control of RHR-V-8 to the Alternate Remote Shutdown Panel and concludes that it does not involve an unreviewed safety question. The Supply System has evaluated this request per 10 CFR50.92 and provides the following in support of the finding for no significant hazards consideration:

- 1) The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated because the installation of the key-lock provides additional assurance that RHR-V-8 will not open inadvertently. The change results in a reduction in the probability of a high/low pressure interface failure as a result of a postulated control room fire concurrent with an inadvertent opening of RHR-V-8.

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REQUEST FOR TS AMENDMENT TABLE 3.3.2-1, ISOLATION  
ACTUATION INSTRUMENTATION (ADDITIONAL CONTROLS)

- 2) The proposed change does not create the possibility of a new or different kind of accident from any previously evaluated. A key-lock switch failure will not prevent returning control of RHR-V-8 to the control room which is in accordance with the original approved design of the plant. The addition of the key-lock is intended to add an additional action, thus further preventing the inadvertent opening of RHR-V-8.
- 3) The proposed change does not involve a significant reduction in a technical specification margin of safety because the automatic isolation remains in service for the RHR-V-9 valve and equivalent restraints are applied in preventing inadvertent actuation of RHR-V-8.

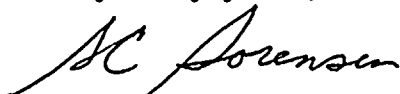
As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does it involve a significant increase 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).

An application fee is not required as this is a supplemental submittal. 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

HLA/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 )

Subject: T.S. TABLE 3.3.2-1  
ISOCATION ACTUATION DIST  
ADDITIONAL CONTROL

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.

DATE 12 FEB, 1988

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 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 12<sup>th</sup> day of February 1988.

S. R. McChalk  
Notary Public in and for the STATE  
OF WASHINGTON

Residing at Burbank, WA.  
Dec 89.