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SUBJECT: Application for amend to License NPF-21,changing Tech Spec
 Table 3.3.7.5-1,accident monitoring instrumentation.

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G02-88-161
July 25, 1988

Docket No. 50-397

Nuclear Regulatory Commission
Attn: Document Control Desk
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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 notes be added to Tables 3.3.7.5-1, Accident Monitoring Instrumentation, and 4.3.7.5-1 Accident Monitoring Instrumentation Surveillance Requirements 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 (see attached).

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 apparent failure of the Acoustic Monitor (Safety/Relief Valve Position Indicator, Item 10) for MS-RV-1B, the Supply System entered the seven day LCO (Action 80.a) at 1638 hours on July 20, 1988. 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-4).

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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. TMI Action Plan Item II.D.3 "Direct Indication of Relief and Safety-valve Position" requires that "Reactor coolant system relief and safety valves shall be provided with a positive indication in the control room derived from a reliable valve-position detection device or a reliable indication of flow in the discharge pipe." The technical specifications for WNP-2 require two instrumentation channels for providing this information on valve position. One channel utilizes an acoustic monitor. The second channel utilizes thermocouples to detect a temperature increase indicative of flow past the valve. The 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.

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

- 1) 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 capable of indicating valve actuation since the failed monitor was identified. Channel checks of the temperature recorder are currently performed monthly per LCO 3/4.3.7.5. Until MSRV-1-B is declared operable, the tail pipe temperature surveillance will be performed daily instead of monthly. (See proposed change to Table 4.3.7.5-1 attached.) A control room annunciator is available that alarms on high tail pipe temperature (greater than 250°F). An annunciator response procedure addressing the tail pipe temperature alarm will be revised to uniquely identify appropriate actions for MS-RV-1B.
- 2) 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.
- 3) 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.
- 4) 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-1B is not controlled on either of the remote shutdown panels or an ADS valve.

As the failure 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 as attached be granted until the next scheduled outage (no later than May 15, 1989), or the next forced outage of sufficient duration to effect the necessary repairs. Absent this amendment, the Supply System will be required to unnecessarily shut down by July 27, 1988.

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 15.1.5 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-1B 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-1B valve position and the acceptability of the remaining methods of determining an SRV closed position.

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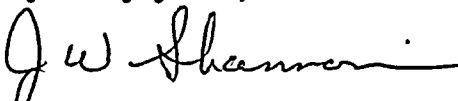
As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does it involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9) and therefore, per 10CFR51.22(b), an environmental assessment of the change is not required.

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.

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 shut down.

Very truly yours,



G. C. Sorensen, Manager
Regulatory Programs

PLP:lw

Attachments

cc:C Eschels - EFSEC
JB Martin - NRV RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA
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