

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

SUBJECT: Application for amend to license NPF-21, modifying TS SR 3.8.4.7 to allow performance discharge test to be performed in lieu of battery svc test for Div 1 & 3, 125 VDC batteries E-B1-1 & HPCS-B1-DG3 & Div 1, 250 VDC battery E-B2-1.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

August 5, 1998
GO2-98-142

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21,
TECHNICAL SPECIFICATION AMENDMENT
REQUEST TO TECHNICAL SPECIFICATION SURVEILLANCE
REQUIREMENT 3.8.4.7**

- References:
- 1) Letter GO2-98-125, JV Parrish (SS) to NRC, "Request for Enforcement Discretion for Technical Specification Surveillance Requirement 3.8.4.7," dated July 16, 1998
 - 2) Letter GO2-98-128, JV Parrish (SS) to NRC, "Exigent Technical Specification Amendment Request to Technical Specification Surveillance Requirement 3.8.4.7," dated July 17, 1998

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications. Specifically, the Supply System is requesting modification of Technical Specification Surveillance Requirement (SR) 3.8.4.7 to allow the performance discharge test to be performed in lieu of the battery service test for the Division 1 and 3, 125 VDC batteries E-B1-1 and HPCS-B1-DG3, and the Division 1, 250 VDC battery E-B2-1. The Supply System has determined that the service test required by SR 3.8.4.7 will expire for battery E-B1-1 on October 19, 1998, followed by E-B2-1 on November 3, 1998 and HPCS-B1-DG3 on November 5, 1998.

This Technical Specification amendment is being requested to negate the need for a plant shutdown in order to comply with Actions specified in Technical Specification LCO 3.8.4 when the surveillance period expires. The proposed change revises Note 1 to SR 3.8.4.7 to add a modifying footnote to allow the performance discharge test in SR 3.8.4.8 to be performed in lieu of the service test in SR 3.8.4.7 for batteries E-B1-1, HPCS-B1-DG3, and E-B2-1 until SR 3.8.4.7 is performed during the R-14 refueling outage, or a forced outage of sufficient duration to perform the service test and accomplish the necessary post test battery recovery actions.

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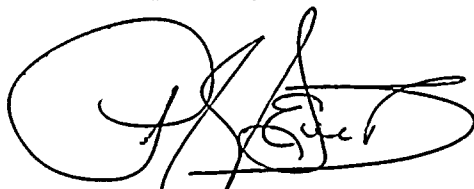
The Staff approved enforcement discretion (reference 1) for SR 3.8.4.7 for battery E-B1-2 when it was determined that its service test had expired. This amendment request is made with the same justification for batteries whose service tests will expire on the aforementioned dates.

Attachment 1 provides the basis for acceptability of the amendment request. Attachment 2 provides the Evaluation of Significant Hazards Consideration. Attachment 3 contains the Environmental Considerations evaluation. Attachment 4 contains the marked up page from Technical Specifications which, if approved, will be used to implement the modified SR. Attachment 4 also reflects the changes to be incorporated by the exigent amendment request currently under review (reference 2). Attachment 5 contains the typed page as it would be revised by this amendment. The Supply System has concluded that the proposed change does not result in a significant hazards consideration or an increase in the amount or type of any effluent that may be released offsite.

The Technical Specification amendment request has been reviewed by the Plant Operations Committee and the Corporate Nuclear Safety Review Board.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. PJ Inserra at (509) 377-4147.

Respectfully,



PR Bemis
Vice President, Nuclear Operations
Mail Drop PE23

Attachments:

1. Basis for Technical Specification Amendment Request
2. Evaluation of Significant Hazards Consideration
3. Evaluation of Environmental Considerations
4. Marked up Technical Specification page
5. Typed revised Technical Specification page

cc: EW Merschoff - NRC-RIV
DF Kirsch - NRC-RIV, WCFO
C Poslusny, Jr. - NRC-NRR

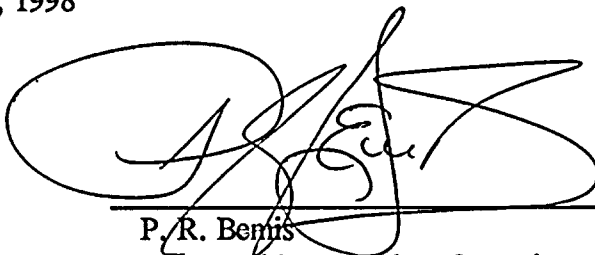
NRC Sr. Resident Inspector - 927N
DL Williams - 1399
PD Robinson - Winston & Strawn

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Request for Amendment of
Tech Spec SR 3.8.4.7


I, P. R. BEMIS, being duly sworn, subscribe to and say that I am the Vice President Nuclear Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the 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 Aug, 5, 1998


P. R. Bemis
Vice President, Nuclear Operations

On this date personally appeared before me P. R. Bemis, 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 5 day of August 1998


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 4/28/02



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TECHNICAL SPECIFICATION AMENDMENT REQUEST
TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 3.8.4.7
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BASIS FOR TECHNICAL SPECIFICATION AMENDMENT REQUEST

Background:

The Supply System has determined that after October 19, 1998, the verbatim requirements of Surveillance Requirement (SR) 3.8.4.7 will not be fulfilled within the Frequency plus the allowed extension time specified in the Technical Specifications. At the time of this letter, the Staff is reviewing a Technical Specification amendment request to allow completion of the battery performance discharge test specified in SR 3.8.4.8 to fulfill the requirements of SR 3.8.4.7 for the Division 2, 125 VDC battery E-B1-2. This submittal is to request that the performance discharge test specified in SR 3.8.4.8 be allowed to fulfill the requirements of SR 3.8.4.7 for the Division 1 and 3, 125 VDC batteries E-B1-1, and HPCS-B1-DG3, and the Division 1, 250 VDC battery E-B2-1 until such time that WNP-2's operational condition supports performance of the battery service test of SR 3.8.4.7 on these batteries.

The battery service test required by the 24 month SR 3.8.4.7 is a special test of the battery's as found capability to satisfy the design requirements (battery duty cycle) of the DC Electrical Power System. The test discharge rate and duration correspond to the design duty cycle requirements specified in the WNP-2 FSAR (Section 8.3.2).

The 60 month SR 3.8.4.8 is satisfied by completion of a battery performance discharge test or a modified battery performance discharge test.

A battery performance discharge test is an as found test of the constant current capacity of the battery intended to determine overall battery degradation due to age and usage. The battery is subjected to a constant discharge rate over a two hour period.

A modified battery performance discharge test is a combination of the two aforementioned tests and is considered a more severe test of battery capacity. It employs two discharge rates, a short duration discharge rate consistent with the largest current load of the duty cycle, followed by the discharge rate used in the battery performance discharge test. The test is intended to confirm the battery's ability to meet the critical period of the load duty cycle and determine its percentage of rated capacity.

Technical Specification SR 3.8.4.7 (Note 1) allows the modified performance discharge test of SR 3.8.4.8 to be performed in lieu of the 24 month battery service test once every 60 months in order to fulfill the requirements of SR 3.8.4.7 and SR 3.8.4.8 with one test. The provision of this note was not fully implemented the last time the surveillance was performed for the batteries in that the test that was performed was the performance discharge test and not the modified performance discharge test.

Prior to the implementation of Improved Technical Specifications (ITS), the Technical Specifications allowed the performance test (vice the modified performance test) to satisfy the service test surveillance requirement once every 60 months.

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The apparent cause for the noncompliance with the SR is an inadequate surveillance procedure resulting from failure to fully reflect the changes enacted through the implementation of ITS. Specifically, the performance discharge test was not modified to incorporate the short duration discharge rate which corresponds to the largest current load of the duty cycle, prior to using it to satisfy SR 3.8.4.7.

Justification:

Division 1 125 VDC battery E-B1-1

The WNP-2 FSAR states that for the first six seconds of usage, the duty cycle for battery E-B1-1 is 570 amps. This short term duty cycle includes 147 amps of contingency power reserved for future loads. This FSAR specification dictates a discharge rate of 570 amps for the first six seconds during the service test, after which, the rate drops to less than 276 amps for a duration of two hours. The performance test requires a constant discharge of 350 amps for two hours. Therefore, a difference of 220 amps for the first six seconds is not enveloped by the performance test. The service test requirement of 570 amps is much less than the manufacturer's 922 amp, one-minute discharge rating. The performance test completed in May of 1998 demonstrated a battery capacity of 102.5% which is above the battery replacement criteria of 80% capacity. Based on the substantial battery capacity demonstrated by the performance test and the short duration peak load required by the service test (570 amps) as compared to the one-minute rating of the battery (922 amps), the battery is fully capable of meeting the requirements of the modified performance test and the service test. Routinely performed surveillances of intercell connector resistance, specific gravity, material condition, and battery terminal voltage indicate continued acceptable battery performance. As a compensatory measure, to remain in effect for the duration specified by this amendment, the Supply System has increased the frequency from annually to quarterly for performance of battery intercell connection resistance measurements for E-B1-1. This provides increased monitoring of conditions that can cause power loss due to resistance heating. These measurements will be performed in addition to the visual examination performed for SR 3.8.4.2.

The battery's manufacturer has been consulted and has concurred that either the performance discharge test or the modified performance discharge test is an adequate indicator of battery capacity. The following is a synopsis of test data gathered at WNP-2 for battery E-B1-1. Based on this justification and test data, it is the Supply System's position that battery E-B1-1 will perform reliably in the current operating cycle.

Battery E-B1-1 Test History

Model:	Exide 2GN-15
Manufactured:	1994
Installed:	1994

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Performance Test Summary (Battery Capacity)

Test data from the initial capacity test and the most recent capacity test indicate battery capacity is greater than 100%.

4/94	100.0%	(Acceptance Test performed at WNP-2)
5/98	102.5%	

Service Test Summary (Duty Cycle Loads)

Test data indicate margin over the required minimum battery terminal voltage of 105 VDC during the most recent service test. The peak current (first 6 seconds) includes 423 amps for duty cycle loads plus 147 amps contingency for a total of 570 amps which is approximately 62% of the battery's one minute rating of 922 amps.

4/96	Voltage @ Initial Peak Current:	112.7 VDC@670 Amps
	Final Voltage:	110.4 VDC@327 Amps

Connection Resistance Summary

Test data from installation compared to current test data indicates connections are acceptable (≤ 24.4 micro-ohms) and show no adverse trend.

Short Connectors

5/94	6 to 8 micro-ohms
5/98	6 to 7 micro-ohms

Long Connectors

5/94	13 to 15 micro-ohms
5/98	13 to 15 micro-ohms

Division 3 125 VDC battery HPCS-B1-DG3

The service test for HPCS-B1-DG3 requires a discharge rate of 72 amps for the first twenty seconds then drops to less than 20 amps for a duration of two hours. The performance test requires a constant discharge of 27.8 amps for two hours. Therefore, a difference of 44.2 amps for the first 20 seconds is not enveloped by the performance test. The service test requirement of 72 amps for twenty seconds is much less than the manufacturer's 115 amp, one-minute discharge rating for the battery. The performance test completed in April of 1998 demonstrated a battery capacity of 110% which is above the battery replacement criteria of 80% capacity. Based on the substantial battery capacity demonstrated by the performance test and the short duration peak load required by the service test (72 amps) as compared to the one-minute rating of the battery (115 amps), the battery is fully capable of meeting the requirements of the modified performance test and the service test. Routinely performed surveillances of intercell connector resistance, specific gravity, material condition, and battery terminal voltage indicate continued acceptable battery performance. As a

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compensatory measure, to remain in effect for the duration specified by this amendment, the Supply System has increased the frequency from annually to quarterly for performance of battery intercell connection resistance measurements for HPCS-B1-DG3. This provides increased monitoring of conditions that can cause power loss due to resistance heating. These measurements will be performed in addition to the visual examination performed for SR 3.8.4.2.

The battery's manufacturer has been consulted and has provided a written statement indicating that based on historical test data it is not credible that HPCS-B1-DG3 would not be able to supply its design load duty cycle. The following is a synopsis of test data gathered at WNP-2 for battery HPCS-B1-DG3. Based on this justification and test data, it is the Supply System's position that battery HPCS-B1-DG3 will perform reliably in the current operating cycle.

Battery HPCS-B1-DG3 Test History

Model: C&D 3DCU-9
Manufactured: 1993
Installed: 1995

Performance Test Summary (Battery Capacity)

Test data from the initial capacity test and the most recent capacity test indicates battery capacity is greater than 100%.

1/93	105.0%	(Acceptance Test at factory)
3/95	121.7%	(Acceptance Test performed at WNP-2)
4/98	110.0%	

Service Test Summary (Duty Cycle Loads)

Test data indicates margin over the required minimum battery terminal voltage of 105 VDC during the most recent service test. The peak current (during first 20 seconds) of 72 amps is approximately 63% of the battery's one minute rating of 115 amps.

5/96	Initial Voltage @ Peak Current:	106.1VDC@81Amps
	Final Voltage:	111.3 VDC@25.7 Amps

Connection Resistance Summary

Test data from installation compared to current test data indicates connections are acceptable (< 169 micro-ohms) and show no adverse trend.

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Short Connector (one)

5/95 18 micro-ohms
7/98 20 micro-ohms

Long Connectors

5/95 70 to 79 micro-ohms
7/98 74 to 83 micro-ohms

Division 1 250 VDC battery E-B2-1

The WNP-2 FSAR states that for the first 15 seconds of usage, the duty cycle for battery E-B2-1 is 1320 amps. This short term duty cycle includes 364 amps of contingency power reserved for future loads. This FSAR specification dictates a discharge rate of 1320 amps for the first 15 seconds during the service test, after which, the rate drops to less than 574 amps for a duration of two hours. The performance test requires a constant discharge rate of 700 amps for two hours. Therefore, a difference of 620 amps for the first 15 seconds is not enveloped by the performance test. The service test requirement of 1320 amps is much less than the manufacturer's 1844 amp, one-minute discharge rating of the battery. The performance test completed in May of 1998 demonstrated a battery capacity of 118.8% which is above the battery replacement criteria of 80% capacity. Based on the substantial battery capacity demonstrated by the performance test and the short duration peak load required by the service test (1320 amps) as compared to the one-minute rating of the battery (1844 amps), the battery is fully capable of meeting the requirements of the modified performance test and the service test. Routinely performed surveillances of intercell connector resistance, specific gravity, material condition, and battery terminal voltage indicate continued acceptable battery performance. As a compensatory measure, to remain in effect for the duration specified by this amendment, the Supply System has increased the frequency from annually to quarterly for performance of battery intercell connection resistance measurements for E-B2-1. This provides increased monitoring of conditions that can cause power loss due to resistance heating. These measurements will be performed in addition to the visual examination performed for SR 3.8.4.2.

The battery's manufacturer has been consulted and has concurred that either the performance discharge test or the modified performance discharge test is an adequate indicator of battery capacity. The following is a synopsis of test data gathered at WNP-2 for battery E-B2-1. Based on this justification and test data, it is the Supply System's position that battery E-B2-1 will perform reliably in the current operating cycle.

Battery E-B2-1 Test History

Model:	Exide 2GN-15
Manufactured:	1991/1992
Installed:	1992

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Performance Test Summary (Battery Capacity)

Test data from the initial capacity test and the most recent capacity test indicates battery capacity is greater than 100%.

5/92	118.6% (Acceptance Test performed at WNP-2)
5/98	118.8%

Service Test Summary (Duty Cycle Loads)

Test data indicates margin over the required minimum battery terminal voltage of 210 VDC during the most recent service test. The peak current (first 15 seconds) includes 956 amps for duty cycle loads (52% of battery's one-minute rating of 1844 amps) plus 364 amps contingency for a total of 1320 amps (72% of the battery's one-minute rating of 1844 amps).

4/96	Voltage @ Initial Peak Current:	214.6 VDC@1560 Amps
	Final Voltage:	219.9 VDC@673 Amps

Connection Resistance Summary

Test data from installation compared to current test data indicates connections are acceptable (< 24.4 micro-ohms) and show no adverse trends.

Short Connectors

5/92	7 to 12 micro-ohms
5/98	4 to 11 micro-ohms

Long Connectors

5/92	14 to 18 micro-ohms
5/98	11 to 17 micro-ohms

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Evaluation of Significant Hazards Considerations

Summary of Proposed Change:

The Supply System has determined that the Frequency plus the allowed extension time will be exceeded for Surveillance Requirement (SR) 3.8.4.7 battery service test on the Division 1 and 3, 125 VDC, batteries E-B1-1 and HPCS-B1-DG3, and the Division 1, 250 VDC battery E-B2-1 during the current operating cycle. The Supply System is submitting a request for a Technical Specification amendment to allow the performance test in SR 3.8.4.8 to be performed in lieu of the service test in SR 3.8.4.7 for these batteries. It is proposed that this change remain in effect until SR 3.8.4.7 is performed on the batteries during the R-14 refueling outage or an outage of sufficient duration to perform the SR 3.8.4.7 service test, whichever occurs first. The Supply System believes that it is more prudent to rely on the demonstrated capability of these batteries as opposed to requiring an unnecessary plant shutdown.

No Significant Hazards Consideration Determination:

Washington Public Power Supply System has evaluated the proposed change using the criteria established in 10CFR50.92(c) and has determined that it does not represent a significant hazards consideration as described below.

The operation of WNP-2 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated:

The safety function of the subject batteries is to provide DC power to the safety-related loads. This establishes the DC Power System as an accident mitigation system, and not an individual precursor of an evaluated accident. The batteries have no role in the initiation of design basis accidents (DBAs) or transients identified in the FSAR.

The proposed change is for a one time relief from verbatim compliance with SR 3.8.4.7 by permitting the performance test in SR 3.8.4.8 to suffice for the SR 3.8.4.7 service test. SR 3.8.4.7 presently allows the 'modified' performance test in SR 3.8.4.8 to be performed in lieu of the service test in SR 3.8.4.7. Either surveillance test provides a demonstration of satisfactory battery performance. Additionally, documented test results since the date of manufacture of batteries substantiate their capability to perform their intended safety functions. The performance tests completed in April and May of 1998 demonstrated battery capacities of greater than 100% which indicates the batteries are not degraded. Based on the substantial battery capacity demonstrated by these performance tests and the short duration peak load required by the service test being less than 75% of the manufacturer's rating for the batteries, they are fully capable of meeting the requirements of the modified performance test and the service test.

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Routine battery surveillances are performed which include specific gravity and battery terminal voltage measurements. As a compensatory measure, in addition to the quarterly visual corrosion inspection, the Supply System will conduct intercell connection resistance measurements on a 92 day frequency and verify the resistance is within the required limit. This additional surveillance measure will ensure the batteries are not susceptible to power loss due to resistance heating.

The probability of an evaluated accident is derived from the probabilities of the individual precursors to that accident. The consequences of an evaluated accident are determined by the operability of plant systems designed to mitigate those consequences. Since the batteries are operable and will remain in service, this action will not change the availability of any safety related equipment and no individual precursors of an accident are affected. Therefore, this change does not increase the probability of an accident previously evaluated. In addition, since the functions and capabilities of systems designed to mitigate the consequences of an accident have not changed, the consequences of an accident previously evaluated are not expected to increase. Therefore, there is no increase in the probability or consequence of an accident previously evaluated.

The operation of WNP-2 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated:

Creation of the possibility of a new or different kind of accident would require the creation of one or more new precursors of that accident. No modifications to plant configuration will result from this proposed one time surveillance requirement change, therefore, no new accident precursors have been added. Documented test results demonstrate the batteries are capable of performing their intended safety functions. Since the batteries have not been modified and will remain in service during operational Modes 1, 2, and 3 as required by the Technical Specifications, no new failure modes of the DC Distribution System are introduced. Therefore, this change will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The operation of WNP-2 in accordance with the proposed amendment will not involve a significant reduction in the margin of safety for the following reasons:

The basis of the margin of safety for the batteries is the two hour operating time defined in the DC System design basis. The batteries are properly sized using the methodology prescribed in IEEE Standard 485-1983 to supply the emergency loads anticipated during a Loss of Coolant Accident (LOCA) with a coincident Loss of Offsite Power (LOOP), for two hours. The last performance of the service test on the batteries encompassed the safety-related two hour duty cycle and demonstrated their ability to supply required emergency loads for their respective duty times.

The performance test uses the manufacturer's two hour discharge rate and is used to establish baseline capacity for trending battery degradation. The results of the last performance test done on the batteries demonstrated capacities of greater than 100% for the batteries which is well above the battery replacement criteria.

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The batteries will not be removed from service during plant operation. Therefore, there is no change in availability of the batteries, battery charger, or distribution system, and as such, there is no change in the base assumptions of our PRA models. Thus there is no impact on the WNP-2 PSA. Therefore, this change will not involve a significant reduction in the margin of safety.

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Environmental Assessment Applicability Review

Washington Public Power Supply System has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21. It has been determined that the proposed changes meet the criteria for categorical exclusion as provided for under 10CFR51.22(c)(9). This conclusion has been determined because the change requested does not pose a significant hazards consideration nor does it involve an increase in the amounts, or a change in the types of any effluent that may be released off-site. Additionally, this request does not involve an increase in individual or cumulative occupational radiation exposure.

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Attachment 4