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SUBJECT: Application for amend to license NPF-21, revising TS 3.3.6.1, Table 3.3.6.1-1, "Primary Containment Isolation Instrumentation."

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October 13, 1999  
GO2-99-181

**Docket No. 50-397**

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

**Gentlemen:**

**Subject: WNP-2, OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT  
TECHNICAL SPECIFICATION 3.3.6.1  
PRIMARY CONTAINMENT ISOLATION INSTRUMENTATION**

- References: 1) Letter, dated May 26, 1988, RB Samworth (NRC) to GC Sorensen (SS),  
"Issuance of Amendment No. 58"
- 2) NRC Administrative Letter 98-10, dated December 29, 1998,  
"Dispositioning of Technical Specifications that are Insufficient to Assure  
Plant Safety"

In accordance with the Code of Federal Regulations, Title 10, Parts 2.101, 50.59 and 50.90, Energy Northwest hereby submits a request for amendment to the WNP-2 Operating License. Specifically, Energy Northwest is requesting a revision to Technical Specification 3.3.6.1, Table 3.3.6.1-1, "Primary Containment Isolation Instrumentation." This amendment requests that Function 5 on the Table, "RHR SDC System Isolation," be modified by removing footnote (d). This footnote is no longer needed because both the inboard and outboard trip systems are now functional in all required modes of operation.

The Reference 1 letter authorized the use of Technical Specification wording similar to that used in footnote (d). This footnote was required to support the method previously used to control a portion of the high/low pressure interface in the residual heat removal (RHR) shutdown cooling (SDC) system in the event of a control room fire. The footnote specifically applied to the outboard suction valve for the RHR system, RHR-V-8. To ensure a control room fire would not impact the control for the valve, the valve transfer switch located at the alternate remote shutdown panel (ARSP) was placed in the "Emergency" position during Modes 1, 2, and 3. This resulted in bypassing the control room circuits for RHR-V-8, thereby, preventing the inadvertent opening of the valve in the event of a control room fire. Footnote (d) was needed to recognize the inoperability of the isolation logic for RHR-V-8 when control was transferred to the ARSP.

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**REQUEST FOR AMENDMENT  
TECHNICAL SPECIFICATION 3.3.6.1**

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Operation of WNP-2 has now been changed in a manner where control of RHR-V-8 is no longer transferred from the control room to the ARSP. A plant modification was performed which makes the inboard suction valve, RHR-V-9, the barrier relied upon for over-pressure protection of the RHR SDC suction line during a fire. Valve RHR-V-9 is in series with valve RHR-V-8 taking suction from a recirculation loop during RHR SDC mode of operation. Valve RHR-V-9 is now protected from opening under all postulated fire conditions by removing power from the valve operator during power operation. The isolation logic and circuitry for both valves (RHR-V-8 and RHR-V-9) remain operable during all modes required by Technical Specification 3.3.6.1. Consequently, footnote (d) is no longer required.

Power can be removed from RHR-V-9 without impacting its operability per Technical Specification Bases 3.6.1.3, "Primary Containment Isolation Valves (PCIVs)." The Limiting Condition for Operation Bases states that normally closed PCIVs are considered operable when automatic valves are de-activated and secured in their closed position.

This request for a change in this Technical Specification is consistent with the requirements in the Reference 2 Administrative Letter.

Additional information has been attached to this letter to complete the amendment request. Attachment 1 describes an evaluation of the proposed change in accordance with 10CFR50.92 and concludes it does not result in a significant hazards consideration. Attachment 2 provides the Environmental Assessment Applicability Review and notes that the proposed change meets the eligibility criteria for a categorical exclusion as set forth in 10CFR51.22. Therefore, in accordance with 10CFR51.22, an environmental assessment of the change is not required. Attachment 3 provides marked up pages of the Technical Specification. Included for your information are the affected Technical Specification Bases pages. Attachment 4 consists of the typed Technical Specification pages as proposed by this amendment.

This request for an amendment has been approved by the WNP-2 Plant Operations Committee and reviewed by the Energy Northwest Corporate Nuclear Safety Review Board. In accordance with 10CFR50.91, the state of Washington has been provided a copy of this letter.

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

Respectfully,



GO Smith (Mail Drop 927M)  
Vice President, Generation

**Attachments**

cc: EW Merschoff - NRC RIV  
JS Cushing - NRC NRR  
NRC Senior Resident Inspector - 927N

TC Poindexter - Winston & Strawn  
DL Williams - BPA/1399  
DJ Ross - EFSEC

STATE OF WASHINGTON )  
 )  
COUNTY OF BENTON )

Subject: Request for Amendment Technical  
Specification 3.3.6.1 Primary  
Containment Isolation Instrumentation

I, G. O. SMITH, being duly sworn, subscribe to and say that I am the Vice President, Generation for ENERGY NORTHWEST, 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.

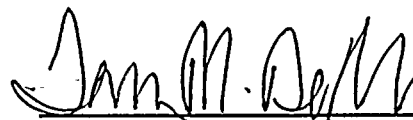
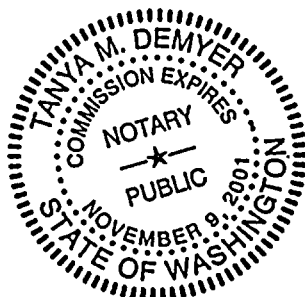
DATE 10/13, 1999



G. O. Smith  
Vice President, Generation

On this date personally appeared before me G. O. SMITH, 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 13 day of October 1999.

  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Benton County

My Commission Expires 11/09/01



**REQUEST FOR AMENDMENT**  
**TECHNICAL SPECIFICATION 3.3.6.1**  
**Attachment 1**  
**Page 1 of 3**

**Evaluation of Significant Hazards Considerations**

**Summary of Proposed Change**

Energy Northwest requests a revision to Technical Specification 3.3.6.1, Table 3.3.6.1-1, "Primary Containment Isolation Instrumentation." This amendment requests that Function 5 on Table 3.3.6.1-1, "RHR SDC System Isolation," be modified by removing footnote (d). This footnote is no longer needed because both the inboard and outboard trip systems are now operable in all required modes of operation.

Footnote (d) was required to support the method previously used to control a portion of the high/low pressure interface in the residual heat removal (RHR) system in the event of a control room fire. The footnote specifically applied to the outboard suction valve for the RHR system, RHR-V-8. To ensure the control for the valve would be unaffected by a control room fire, the valve transfer switch located at the alternate remote shutdown panel (ARSP) was placed in the "Emergency" position during Modes 1, 2, and 3. This resulted in the bypassing of the control room circuits that control the position of RHR-V-8, thereby, preventing the inadvertent opening of the valve in the event of a control room fire. Footnote (d) was needed to recognize the inoperability of the logic associated with this valve when control was transferred to the ARSP.

Operation of WNP-2 has now been changed in a manner where control of RHR-V-8 is no longer transferred from the control room to the ARSP during power operation. The inboard suction valve, RHR-V-9, is now the barrier relied upon for over-pressure protection of the RHR shutdown cooling (SDC) suction line in the event of a control room fire. Valve RHR-V-9 is in series with RHR-V-8 taking suction from a recirculation loop during RHR SDC mode of operation. Valve RHR-V-9 is protected from opening under all postulated fire conditions by removing power from the valve operator. The RHR shutdown cooling isolation logic and circuitry for both valves (RHR-V-8 and RHR-V-9) remain operable during all modes required by Technical Specification 3.3.6.1. Consequently, footnote (d) is no longer required.





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**REQUEST FOR AMENDMENT**  
**TECHNICAL SPECIFICATION 3.3.6.1**  
**Attachment 1**  
**Page 2 of 3**

**No Significant Hazards Consideration Determination**

Energy Northwest has evaluated the proposed change to the Technical Specifications 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.

This change involves the probability and consequences of accidents associated with the isolation of the RHR SDC mode of RHR operation. Isolation is provided if high temperatures occur in RHR pump rooms or heat exchanger areas, if reactor vessel water level is low, or if reactor vessel pressure is high.

FSAR Chapter 15, "Accident Analysis," describes two events associated with the RHR system during SDC operation. FSAR Section 15.1.6, "Inadvertent Residual Heat Removal Shutdown Cooling Operation," describes the impact of system operation during startup or cool-down when the reactor is near critical. The proposed change removes the exemption for the second trip system to isolate RHR SDC operation. There will be no change in the probability or consequences of this accident as a result of the proposed change.

The second accident is described in FSAR Section 15.2.9, "Failure of Residual Heat Removal Shutdown Cooling." It postulates the failure of the RHR system to function in SDC mode. The evaluation assumes a failure of the SDC mode of operation but does not disable the remaining modes of RHR operation. The alternate SDC paths involve the use of the safety relief valves to establish a cooling flow path to the containment suppression pool. That evaluated accident does not result in any fuel failure. The proposed change will not result in an increase in the probability of fuel failures. The evaluated accident does result in normal coolant activity being released to the suppression pool through the safety relief valves. The proposed activity will not result in a change in the release of this coolant activity. The proposed change requires the removal of the exemption for the second trip system to isolate SDC and will have no impact on the probability or consequences of that accident.

Therefore, 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.

**REQUEST FOR AMENDMENT  
TECHNICAL SPECIFICATION 3.3.6.1**

**Attachment 1**

**Page 3 of 3**

**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.**

The proposed change will not cause any new inadvertent SDC startup, loss of water inventory or loss of coolant accidents (LOCA). New or different inadvertent RHR SDC startup accidents are not possible because this change is only a further restriction on system operation. The LOCA during Mode 3 is bounded by the LOCA defined for Modes 1 and 2. No new primary system LOCA can be initiated because of this change.

Therefore, 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.

**The operation of WNP-2 in accordance with the proposed amendment will not involve a significant reduction in the margin of safety.**

The removal of an exemption for the second trip system, as proposed by this change, will increase the probability that leaks and high pressure will be isolated. Therefore, operation of WNP-2 in accordance with the proposed amendment will not decrease the margin of safety. Therefore, the operation of WNP-2 in accordance with the proposed amendment will not involve a significant reduction in the margin of safety.



**REQUEST FOR AMENDMENT**  
**TECHNICAL SPECIFICATION 3.3.6.1**  
**Attachment 2**  
**Page 1 of 1**

**Environmental Assessment Applicability Review**

Energy Northwest has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21.

The proposed change meets the criteria for categorical exclusion as provided for in 10CFR51.22(c)(9). 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.

Furthermore, this request does not involve an increase in individual or cumulative occupational exposure.