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SUBJECT: Requests discretionary enforcement re TS 3/4.3.3 ECCS actuation instrumentation & applicability Spec 3.0.3.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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November 21, 1988
G02-88-244

Docket No. 50-397

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

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
REQUEST FOR DISCRETIONARY ENFORCEMENT WITH RESPECT TO TECHNICAL SPECIFICATION 3/4.3.3 EMERGENCY CORE COOLING SYSTEM ACTUATION INSTRUMENTATION AND APPLICABILITY SPECIFICATION 3.0.3

Reference: Generic Letter 87-09 "Sections 3.0 and 4.0 of the Standard Technical Specifications on the Applicability of Limiting Conditions for Operation and Surveillance Requirements", dated June 4, 1987

Technical Specification Action Statement 3/4.3.3.a reads:

> "With an ECCS actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.3-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value."

The 4.16 kV Emergency Bus Undervoltage Degraded Voltage Time Delay Relay (TDR) described in Table 3.3.3-2 consists of two time delay/relays; 5 seconds and 3 seconds. Recent internal SSFI review of the procedures associated with confirming the 8 second TDR settings has determined that only the 5 second TDR calibration is included in our Technical Specification calibration procedures. The 3 second TDR calibration is included in our Scheduled Maintenance System (SMS) program and was deferred for Emergency Bus SM-7. If considered inoperable due to not performing the required calibration surveillance test, Action Statement 3/4.3.3.b. refers to Table 3.3.3-1 Action Statement 38. However, the action statement addresses a single channel inoperable condition only. Accordingly, Technical Specification 3.0.3 is then applied, requiring a plant shutdown to be initiated within one hour.

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However as discussed in the referenced Generic Letter the Staff has recognized that a missed surveillance does not, of itself, confirm inoperable equipment. Hence a shutdown based on a missed surveillance would be an overly conservative action when the equipment could be proven operable upon completion of the missed surveillance. Further the Staff concluded that 24 hours was an acceptable time limit for completing a missed surveillance when the allowable outage time of the action requirements were less than the 24 hour limit. Such is the case with the relays discussed above.

Therefore the Supply System is requesting discretionary enforcement with respect to the subject Technical Specifications for the 24 hour period contemplated in Generic Letter 87-09 beginning 0830 PST November 21, 1988.

The concept that the 3 second time delay relay is part of the channel required to be tested was not previously considered. That portion of the logic considered to represent each channel is apart from the 3 second time delay relay function. The 3 second TDR is also identical to numerous other control relays providing safety functions and similarly not tested. This was a recent NRC SSFI finding and the Supply System has committed to a test program. This condition represents a unique application of the Technical Specifications not previously considered and as such could not have been reasonably foreseen.

The confusion in surveillance requirements is believed to result from the 8 second time delay function including more of the protective circuit than the individual channels. This being the case the 3 second time delay relays were included in our SMS versus Technical Specification calibration procedures.

As stated in Table 3.3.3-2 the allowable value tolerance for the combined TDRs is ± .8 seconds. The manufacturers drift tolerance for the 3 second relay is 5% (.15 seconds). The 5 second relays were replaced in R-3 with solid state components having an in-plant tolerance of ± .1 seconds. The tolerance then available to the 3 second TDRs is .7 seconds (.8 allowed by Technical Specification minus .1 associated with the new 5 second TDRs). The manufacturers drift tolerance (.15 seconds) is well within the .7 seconds remaining. Additionally the TDR's having the same function on SM-8 were calibration checked in May 1987 with results within the drift tolerance above. A plant shutdown in light of these considerations would be overly conservative and subject the plant to an unnecessary thermal cycle. Avoidance of the shutdown is beneficial and far outweighs any disadvantages associated with the additional 24 hours in which to perform the missed surveillance.

The performance of the calibration of the 3 second TDR's for SM-7 at power is considered acceptable for the following reasons:

One TDR provides for annunciation only and as such removal from service to test the TDR does not affect the degraded voltage function. It will also provide an alert if the degraded voltage condition were to occur during other TDR testing.

The remaining two TDR's monitor SM-1 and TR-B voltage conditions and actuate at 3 seconds dependent upon which source is tied to SM-7. A degraded voltage condition on SM-1 causes transfer to TR-B and diesel generator #1 start. A degraded voltage on TR-B causes diesel generator #1 to start and energize SM-7.

If the degraded voltage existed during this short time the effect would be similar to loss of a diesel generator, which is an analyzed design bases event. The other divisional bus remains functional and would alert the control room operators of the degraded voltage condition. The probability of the degraded bus voltage condition is considered remote due to the past operating experience of the BPA grid. The stability of the BPA grid is provided for through (automatic degraded grid voltage condition) load shedding and the development of comprehensive contingency plans. Therefore the type of grid disturbance most probable is a loss of voltage which remains monitored by the primary undervoltage relays.

It should also be recognized that calibration of the 5 second TDR listed on Table 3.3.3-2 for Division I and II ECCS requires an ECCS to become inoperable.

In addition action statements for the diesel generator associated with the TDRs to be calibrated will be applied during the calibration period to further maintain that divisions on site power supply.

The Supply System asserts that this request is in the public benefit and does not place the plant in an unsafe condition.

Very truly yours,

CM Powers

C. M. Powers
WNP-2 Plant Manager

PLP/bk

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A