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 BOUCHEY, G.D. Washington Public Power Supply System
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SUBJECT: Application for amend to License NPF-21, revising Tech Spec
 Surveillance Requirement 4.8.1.1.2.e.7.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

December 2, 1988
G02-88-257

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 4.8.1.1.2.e.7

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 that surveillance 4.8.1.1.2.e.7 be revised (as attached). This is being revised so that the technical specifications are consistent with the design of the automatic bypass function of the diesel generator trips.

The design description discussed in the WNP-2 Final Safety Analysis Report sections 8.3.1.1.8.1.8 and 8.3.1.1.8.2.8 states that for Divisions 1, 2 and 3 upon accident signal (low reactor water level, high drywell pressure) only the following diesel generator trips are effective:

- o Engine overspeed
- o Generator differential relay action
- o Incomplete sequence
- o Emergency stop pushbutton

These changes were an oversight in the preparation of the WNP-2 technical specifications as the FSAR descriptions were issued in amendments 23 and 31 (February 1982 and June 1983) before issuance of the WNP-2 Operating License (December 1983) and should have been reflected in the technical specifications.

Currently the subject Technical Specification omits verification of the incomplete starting sequence trip bypass upon an ECCS actuation signal for Division 3. It also inaccurately states that the automatic bypass function occurs upon a loss of voltage signal for Divisions 1, 2 and 3 concurrent with the accident signal. It occurs with the accident signal alone.

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The Supply System has reviewed this request per 10CFR50.59 and concluded that it does not involve an unreviewed safety question. The Supply System has also evaluated this request per 10CFR50.92 and provides the following in support of a finding for no significant hazards consideration. This change does not:


- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because there is no change in system function. The accident analyses performed for this equipment are based on the FSAR description and have not been changed. This change only corrects the inconsistency between the FSAR and technical specification description.
- 2) Create the possibility of a new or different kind of accident from an accident previously evaluated because there is no change to the actual design and system function is unchanged. The changes requested are strictly within the original safety analysis report and do not represent any new or different features.
- 3) Involve a significant reduction in a margin of safety because the omissions being corrected support the margin of safety originally evaluated in the FSAR and should have been carried into the technical specifications. Hence, the correction of these omissions does not impact a margin of safety.

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 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).

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.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

Attachment

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



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STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Surveillance Requirement
4.8.1.1.2.e.7

I, G. D. Bouchey, being duly sworn, subscribe to and say that I am the Director, Licensing & Assurance or 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 Dec 2, 1988

G. D. Bouchey
G. D. Bouchey, Director
Licensing & Assurance

On this day personally appeared before me G. D. Bouchey 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 2nd day of December 1988.

Audrey Ann Jenkins
Notary Public in and for the STATE
OF WASHINGTON

Residing at Richland



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