ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR:8902070199 DOC.DATE: 89/02/01 NOTARIZED: NO DOCKET #
FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
AUTH.NAME AUTHOR AFFILIATION
POWERS,C.M. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
VIRGILIO,M.J. Assistant Director for Region III & Region V Reactors

SUBJECT: Requests temporary waiver of compliance from Tech Spec surveillance requirement 4.8.1.1.2.e.7.b.

DISTRIBUTION CODE: A001D COPIES RECEIVED:LTR 1 ENCL 0 SIZE: 3
TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR	COPIES ENCL
	PD5 LA	1	0	PD5 PD	2	2
	SAMWORTH,R	1	1			
INTERNAL:	ACRS	6	6	ARM/DAF/LFMB	1	0
	NRR/DEST/ADS 7E	1	1	NRR/DEST/CEB 8H	1	1
	NRR/DEST/ESB 8D	1	1	NRR/DEST/MTB 9H	1	1
	NRR/DEST/RSB 8E	1	1	NRR/DEST/SICB	1	1
	NRR/DOEA/TSB 11	1	1	NUDOCS-ABSTRACT	1	1
	OGC/HDS2	1	0	REG FILE 01	1	1
	RES/DSIR/EIB	1	1			
EXTERNAL:	LPDR	1	1	NRC PDR	1	1
	NSIC	1	1			

R I D S / A D D S

R I D S / A D D S

NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK, ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 25 ENCL ~~22~~ 0

A/A 2

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 1, 1989
G02-89-013

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: M. J. Virgilio
Acting Assistant Director for
Regions 3 & 5 Reactors NRR
Mail Station P1-137
Washington, D.C. 20555

Gentlemen:

Subject: **NUCLEAR PLANT NO. 2**
REQUEST FOR TEMPORARY WAIVER OF COMPLIANCE FROM TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 4.8.1.1.2.e.7.b

Reference: Letter G02-88-257, G.C. Sorensen (Supply System) to NRC, "Request for Amendment to Technical Specification Surveillance Requirement 4.8.1.1.2.e.7," dated December 2, 1988

In the reference the Supply System requested an amendment to the WNP-2 Technical Specifications so that they would be consistent with the design of the diesel generator trip bypasses as described in the Final Safety Analysis Report.

The purpose of this letter is to request a waiver of compliance from the Technical Specifications surveillance requirements applicable to Division 3 incomplete start sequence bypass verification until appropriate changes to the Technical Specifications can be granted.

Currently the subject Technical Specification indicates an incomplete starting sequence trip bypass upon an ECCS actuation signal for Division 3.

Regulatory Guide 1.9, "selection, design, and qualification of Diesel-Generator Units Used As Standby (onsite) Electric Power Systems At Nuclear Power Plants" recognizes the hierachy of diesel generator protection circuits. This document acknowledges the retention of certain trip functions after the receipt of a LOCA signal. The non-bypassed trips identified in the Technical Specifications, Section 4.8.1.1.2.e.7.b, are those actions which could prevent substantial hardware damage that could then render the unit incapable of being restored by operator action.

A001
1/0

For the HPCS diesel generator (Division 3) the design approach applied at WNP-2 allows for only those protective features that are required to prevent immediate failure to shut down the system equipment when operating under a LOCA condition. There are three (3) automatic actions in the logic.

The overspeed protective feature is retained during a LOCA condition to prevent serious damage to the system and to reduce potential for generation of missiles during complete governor failure. Enough margin in the overspeed trip setting is provided to avoid tripping during transients.

The generator differential current protection feature is designed to prevent serious damage to the generator. This type of failure could result in fires and/or create additional hazards requiring the attention of plant personnel.

The incomplete start sequence is not considered to be an engine protective feature, but a part of the engine start logic. It does not provide for tripping of a running engine. The incomplete starting sequence is a standard Stuart & Stevenson and Morrison Knudsen design (suppliers to WNP-2). The circuitry associated with the incomplete starting sequence is monitoring circuitry which notifies the operator of a failure to start thus allowing operator intervention.

The purpose of the incomplete start sequence features is to preserve air if a starting attempt is unsuccessful. If the engine does not achieve 200 RPM or engine jacket water pressure within 5 seconds, the start attempt is aborted by this feature.

If the engine does not start in the first 5 seconds it most likely will not start. Continued cranking would be fruitless. The 5 second duration was chosen by the diesel generator vendor as a reasonable period for the engine to start. Normally the engine is above 200 RPM within 2 seconds.

This starting sequence protective feature is in effect only during the initial starting sequence of the unit. That is, this protection is disabled during normal operation of the unit. When the speed of the diesel generator unit exceeds 200 RPM this protective feature and subsequent unit lockout is disabled. This speed is detected by a electronic speed sensor using a magnetic pickup on the engine flywheel and provides numerous other engine control functions and indications. Redundant to this, a backup jacket water pressure switch, on the discharge of the engine driven water pump, set at 20 psig, can indicate successful start and also block the incomplete starting sequence logic.

Thus this circuitry protects the starting resources of emergency diesel generator system. WNP-2 does not believe this feature is a protective device as defined in Regulatory Guide 1.9 and therefore is not required to be bypassed. The redundant parameter disabling feature eliminates the potential for spurious tripping action caused by the failure of one of the contributing instruments.

I certify that based upon this technical evaluation WNP-2 can continue to be safely operated without compliance to the above discussed Technical Specification surveillance requirement during the time required for the NRC to process the amendment request.

Very truly yours,

C M Powers

C. M. Powers
WNP-2 Plant Manager

CMP/bc

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