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SUBJECT: Application for amend to License NPF-21, incorporating clarifications & recommendations per GL 87-09.

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February 9, 1989  
G02-89-016

Docket No. 50-397

U. S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
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Gentlemen:

Subject: NUCLEAR PLANT NO. 2  
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT  
TO TECHNICAL SPECIFICATION SECTIONS 3.0 AND 4.0  
"LIMITING CONDITIONS FOR OPERATION AND SURVEILLANCE  
REQUIREMENTS" AS RECOMMENDED BY GENERIC LETTER 87-09

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 the clarifications and recommendations provided by the Staff in Generic Letter 87-09 be incorporated (as attached) in the WNP-2 Technical Specifications.

The changes requested are to specifications 3.0.4, 4.0.3 and 4.0.4 and are as recommended by the generic letter. Briefly:

- o The change to 3.0.4 would alleviate unnecessary restrictions on mode changes. This proposal would allow mode changes when in an ACTION statement that allows continued operation for an unlimited period of time. With the change to Specification 3.0.4, individual exceptions to 3.0.4 where the ACTION statement does not require a shutdown are no longer necessary. Exceptions to 3.0.4 in specifications that do require a plant shutdown are retained. Deletions of the appropriate exceptions are provided in the attached marked-up specifications.

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- o The proposed change to 4.0.3 would eliminate unnecessary shutdowns which are now required if a surveillance interval is inadvertently surpassed. The change would allow delaying compliance with an ACTION statement for up to 24 hours in order to allow performance of a missed surveillance. Therefore, if a missed surveillance can be performed within 24 hours, plant shutdown would not be required.
- o The proposed change to 4.0.4 is necessary to allow the plant to proceed through or to required operational modes to comply with ACTION requirements even though applicable surveillance requirements may not have been performed.

The Staff, in Generic Letter 87-09, concluded that these modifications would result in improved technical specifications and encouraged licensees to proceed with requesting these changes. Requested modifications to the Bases associated with these specifications, as recommended by the Staff, are also enclosed.

The Supply System has evaluated this amendment request per 10CFR50.59 and 50.92 and determined that it does not represent an unreviewed safety question or a significant hazard because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because:

The change to Specification 3.0.4 will allow mode changes while the plant is in an ACTION statement which does not prohibit power operation. Exception to 3.0.4 has already been taken in many of the individual ACTION statements. Incorporating the proposed change into 3.0.4 will ensure that exceptions will be consistently applied when justified. Deletion of the individual exceptions will have no impact upon the requirements in the Specifications since the exception to 3.0.4 will now be contained within 3.0.4.

The change to Specification 4.0.3 will allow delay in the application of ACTION requirements for up to 24 hours when a surveillance has been missed. Because surveillances normally verify system or component operability, as opposed to discovering inoperability, the allowance of an additional 24 hours to demonstrate operability is not significant. Without the 24 hour delay it is likely that a missed surveillance would force a plant shutdown. Avoidance of this transient state and associated thermal cycling is beneficial and far outweighs any incremental uncertainties regarding system operability associated with the additional 24 hours in which to perform a missed surveillance.

The change to Specification 4.0.4 will not result in a change to the design or operation of the facility and is administrative in nature. This change will not result in an increase in the probability or consequences of an accident.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because:

The change to 3.0.4 will allow the plant to continue operation in an ACTION statement which already allows continued operation. As such, no new modes of operation are being introduced by this change.

The change to 4.0.3 would allow the plant to continue operation for an additional 24 hours after discovery of a missed surveillance. Missing a surveillance does not mean that a component or system is inoperable. In most cases surveillances demonstrate the continued operability of the components and systems. All systems and components currently required to be verified operable by Technical Specification requirements will continue to be maintained operable. This change will not affect the design of the plant and will not allow the plant to be operated outside the currently allowed modes of operation.

The change to 4.0.4 will alleviate a contradiction within the specifications. This change is administrative and does not affect any of the accident analysis.

- 3) Involve a significant reduction in a margin of safety because:

The change to Specification 3.0.4 will allow mode changes in ACTION statement that do not require plant shutdown. Exceptions to 3.0.4 are already contained within many of the applicable ACTION statements. Incorporating the exceptions within 3.0.4 will ensure their consistent application.

The change to 4.0.3 will allow up to 24 hours to perform a missed surveillance. In most cases this will eliminate the need for a plant shutdown. The overall effect is a net gain in plant safety due to avoidance of unnecessary shutdowns due to missed surveillances.


The change to 4.0.4 is administrative in nature and therefore does not affect any margin of safety.

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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 10CFR 51.22(c)(9) and therefore, per 10CFR 51.22(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).

Very truly yours,

  
G. C. Sorensen, Manager  
Regulatory Programs

PLP/bk  
Attachments

cc: C Eschels - EFSEC  
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