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ACCESSION NBR: 8904240044 DOC. DATE: 89/04/12 NOTARIZED: YES DOCKET #  
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 SORESENSEN, G.C. Washington Public Power Supply System  
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SUBJECT: Application for amend to License NPF-21, reflecting results of rev to dc sys battery calculations.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 12, 1989  
G02-89-059

Docket No. 50-397

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

Gentlemen:

Subject: NUCLEAR PLANT NO. 2  
OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT TO TECHNICAL  
SPECIFICATION 3/4.8.2, DC SOURCES  
(ADDITIONAL CHANGES)

Reference: Letter, G02-88-065, GC Sorensen (SS) to NRC,  
same subject, dated March 18, 1988

In the reference letter, changes were requested to the load profiles for the Division 1, 2 and 3-125 Volt DC Power Systems, and the Division 1-250 Volt DC Power System. These changes were requested to reflect the results of the revisions to the DC System battery calculations. Although already considered in the new load profiles submitted with the referenced request for amendment, an additional change is necessary to accurately reflect the assumptions used in the referenced calculations for the Division 1-250 Volt DC System.

In most cases a battery aging factor of 25% was used in sizing the batteries. This results in a battery being replaced when its actual measured capacity drops to 80% of its rated capacity. However, a 20% aging factor was utilized for sizing the Division 1-250 Volt DC Battery System. The aging factor was reduced to 20% to keep the calculation results within the bounds of the installed equipment. This will require the battery system to be replaced when its measured capacity drops to 83.4% of its rated capacity. This and an associated change is reflected in the attached marked up Tech. Spec. page 3/4 8-13.

The Supply System has reviewed the revision to the aging factor for the Division 1-250 Volt DC batteries 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:

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 3/4.8.2  
DC SOURCES (ADDITIONAL CHANGE)

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because changing the aging factor does not represent a change in the methodology for sizing the batteries or a change in the battery design requirements. It also does not extend the duty life since it is to be replaced on an earlier schedule, consistent with the other batteries.
- 2) Create the possibility of a new or different kind of accident from any previously evaluated because the batteries themselves are not being changed nor are any changes being made to the way they were being utilized or asked to perform. The only change is in the input assumptions for the calculation, and that change is being accounted for by an additional conservatism with respect to replacement period.
- 3) Involve a significant reduction in a margin of safety because the capacity requirement for the Division 1-250 Volt DC battery has been raised from 80 to 83.4 percent of the manufacturer's rating to offset a reduction in the sizing calculations "aging factor" from 25 to 20 percent. Additionally, the indication of degradation has been changed from 90 to 93.4 percent of manufacturer's rating. The only effect of this change is to potentially require earlier replacement of the battery which will be identified by the Tech. Spec. surveillance results.

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). In accordance with 10CFR 50.91, the State of Washington has been provided a copy of this letter.

Very truly yours,

  
G. C. Sorensen, Manager  
Regulatory Programs

HLA/bk  
Attachments

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

STATE OF WASHINGTON )  
COUNTY OF BENTON )

Subject: DC Sources

I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for 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 12 April, 1989

G. C. Sorensen  
G. C. SORENSEN, Manager  
Regulatory Programs

On this day personally appeared before me G. C. SORENSEN 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 12th day of April, 1989.

Barbara Z. Robertson  
Notary Public in and for the  
State of Washington

Residing at Richland, WA  
My Commission expires 7/14/91

