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 SORESEN, G.C. Washington Public Power Supply System
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SUBJECT: Forwards suppl info to 890331 application for amend to
 License NPF-21, per NRC 890515 & 22 telcons.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

June 1, 1989
G02-89-101

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 SPECIFICATIONS 3/4.2.6, POWER FLOW INSTABILITY
AND 3/4.2.7 NEUTRON FLUX NOISE MONITORING, SUPPLEMENTAL
INFORMATION

Reference: Letter, G02-89-051, G.C. Sorensen (SS) to NRC,
same subject, dated March 31, 1989

As a result of phone conversations with the Staff on May 15 and 22, 1989 it was recognized that editorial modifications to the changes requested in the reference letter should be made. Attachment 1 provides these changes. Further the Staff requested information on the hardware and computer equipment supporting the ANNA Stability Monitoring System and a draft of the procedure that will be used to demonstrate ANNA system operability. Attachments 2 and 3 provide this information.

The reference requested changes to the Technical Specifications to replace the existing detect-and-suppress technical specifications with specifications based on the ANNA Stability Monitoring System developed by Advanced Nuclear Fuels (ANF). The ANNA system as implemented at WNP-2 represents only a software modification to the existing plant configuration. All of the necessary hardware was already in place in the form of our Plant Process Computer Replacement System (PPCRS). Attachment 2 provides details of the PPCRS system hardware, software, configuration, and display menu system. The ANNA system is currently capable of identifying a high decay ratio within 30 to 60 seconds of occurrence. Procurement of an upgrade in CPU capability has been approved which will cut this response time to approximately 10 seconds (anticipated upgrade completion is July 1989).

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REQUEST FOR AMENDMENT TO TS 3/4.2.6 POWER FLOW INSTABILITY AND
3/4.2.7 NEUTRON FLUX NOISE MONITORING, SUPPLEMENTAL INFORMATION

The impact on plant procedures as a result of adopting stability monitoring system based technical specifications will initially be minor. As discussed in the referenced submittal, the stability monitoring system will be implemented within the framework of the existing Interim Corrective Actions. These actions have already been incorporated into the plant operating procedures. The only changes required will be to include directions for demonstrating the ANNA system operable prior to entry into Region C in accordance with the Interim Corrective Actions, directions for exiting the region should ANNA be found to be inoperable, and directions for responding to ANNA indications. Whereas previously the APRM recorders and LPRM upscale/ downscale alarms represented the principal variables to be monitored, the ANNA displayed decay ratio and peak-to-peak noise values will represent the principal variables to be monitored. Our procedures will direct control room personnel to confirm ANNA peak-to-peak indications via the APRM recorders and the rod display LPRM meters prior to initiating a manual scram in accordance with the Interim Corrective Actions. A proposed ANNA operability surveillance procedure is enclosed (Attachment 3).

In addition to the editorial modifications, attachment 1 provides a brief description of the differences between the changes requested in the Referenced letter and the modifications proposed as a result of the above mentioned phone conversations. The Supply System in submitting these modifications considers them to be within the scope of the changes requested in the Reference and accordingly the conclusions as to plant safety, proposed no significant hazard determination and environmental assessment submitted in the Reference are applicable to these modifications.

These modifications have 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

PLP/bk
Attachments

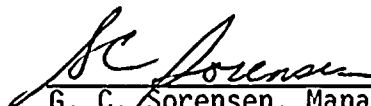
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Subject: T.S. 3/4.2.6
3/4.2.7

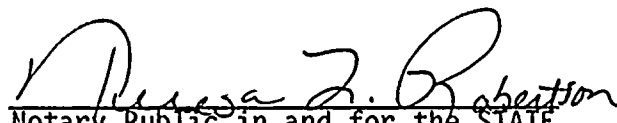
I, G. C. Sorensen, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE June 1, 1989

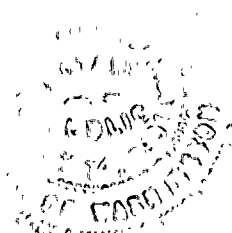

G. C. Sorensen, Manager
Regulatory Programs

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 1st day of June 1989.


Notary Public in and for the STATE
OF WASHINGTON

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





ATTACHMENT 1

SUMMARY OF MODIFICATIONS TO THE PROPOSED CHANGES SUBMITTED IN THE REFERENCE (G02-89-51, MARCH 31, 1989)

- o The definition of IMMEDIATELY has been deleted. Where it was proposed in the Reference the phrase "as soon as practical, but in all cases within 15 minutes" has been inserted as replacement. This eliminates the need to change pages i, ii, iii, 1-3, 1-4, 1-5, 1-6, 1-7 and 1-8. These pages and the page providing a definition of IMMEDIATELY are hereby withdrawn as no changes to these pages are necessary.
- o In keeping with the precedence set by IE Bulletin 88-07 and the Interim Corrective Actions the area labeled Region "B" on Figure 3.2.7-1 is relabeled "C" to denote an area allowed for operations instead of an area requiring prompt departure. This is corrected also in the applicability statement of Limiting Condition for Operations (LC0) 3.2.7.
- o The surveillance requirements of LC0 3.2.7 and 3.2.8 have been modified to better define requirements for monitoring the stability monitoring system when in the region of applicability and the method of determining stability monitoring system operability has been expanded.
- o Figure 3.2.8-1 and Figure 3.4.1.1-1 of the Reference submittal have been modified to show that Region C considerations are not required at core flow greater than 45%. This is in accordance with the Interim Corrective Actions and IEB 88-07 which require Region C considerations only when below 45% core flow.
- o Action item 3.4.1.1.a.2.f) (page 3/4 4-2) and Surveillance Requirement 4.4.1.1.1.c page (3/4 4-3) address noise level monitoring and suppression which is covered by the changes in Figure 3.4.1.1-1 imposed by the Interim Corrective Actions and IEB 88-07. The ANNA system and the changes to Figure 3.4.1.1-1 preclude the need for these statements and they should have been included in the Reference letter as needing to be deleted.
- o The Bases changes in the Reference are changed to better identify the boundaries of Region A and the boundaries of operation in Single Loop. Additionally more description of the ANNA Stability Monitoring System is provided.



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MODIFICATIONS OF THE REFERENCE SUBMITTAL CHANGES