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 SORENSEN,G.C. Washington Public Power Supply System
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SUBJECT: Application for amend to License NPF-21, modifying Table
 3.3.7.5-1 to remove Instruments 24 & 29.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

June 23, 1989
G02-89-114

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 TABLES 3.3.7.5-1 AND 4.3.7.5-1
 ACCIDENT MONITORING INSTRUMENTATION AND SURVEILLANCE
 REQUIREMENTS - POST ACCIDENT SAMPLING SYSTEM (PASS)

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 subject tables be modified, as attached, to remove instruments No. 24 and 29. These instruments, Post Accident Sampling Containment Atmospheric and Primary Coolant Radiation Monitors are part of the PASS but do not support the bases (section 3/4.3.7.5) of the Accident Monitoring Instrumentation or the function of PASS. The function of the PASS is to provide a method for evaluating the extent of core degradation as required by TMI action item II.B.3. The bases for the Accident Monitoring Instrumentation LCO is to ensure selected parameters necessary to monitor and assess plant conditions following an accident are available. The monitors do not support either bases. Accordingly, these instruments should be removed from the Technical Specifications.

Presently these monitors, integral to the Post Accident Sample Sink, perform the following functions:

#24 Containment Atmospheric Radiation Monitor - "The deposition of iodine is monitored during sampling using a radiation detector installed adjacent to the cartridge." (WNP-2 FSAR Appendix B, page B.2-16c).

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REQUEST FOR AMENDMENT TO TS TABLES 3.3.7.5-1 AND 4.3.7.5-1
ACCIDENT MONITORING INSTRUMENTATION & SURVEILLANCE REQUIREMENTS

#29 Primary Coolant Radiation Monitor - "A radiation monitor in the liquid sample enclosure monitors liquid flow from the sample station to provide immediate assessment of the sample activity level. This monitor also provides information as to the effectiveness of the demineralized water flushing of the sample system following sample operation." (WNP-2 FSAR Appendix B, page B.2-16a).

Per plant procedures neither monitor:

- o provides input to plant actions during or following an accident, nor
- o contributes to calculations relied upon to determine the extent of core damage post accident. Portable area radiation monitors are used to minimize exposure of personnel during sampling activities.

The Supply System does not intend to remove these instruments from service. They will be maintained as are other non-safety related instrumentation. The instruments are part of the PASS which is a function required by the Procedures and Programs section 6.8.4.c in the Administrative Controls section of the WNP-2 Technical Specifications. The inoperable status of the devices however should not impact plant operation since it is the capability to sample and not the information provided by these instruments that is required.

Although not relied upon as justification for removal, it appears that these instruments may have been added to the WNP-2 Technical Specification in error. Similar Technical Specifications for LaSalle, Susquehanna, Shoreham, Fermi, Hatch, and Limerick do not contain these instruments and as such may provide a precedent for their removal.

The Supply System has reviewed the requested amendment and determined that it does not represent a significant hazard because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because, as discussed above, the instruments do not provide input to plant actions during or following an accident. As such the removal of these instruments from the Technical Specifications will not affect the plant accident response capabilities. Hence, no increase in the consequences of an accident previously evaluated is considered credible. The PASS and the subject instruments are used post accident but do not provide an automatic mitigation function. The proposed change can therefore not influence the probability of occurrence of an accident previously evaluated.

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ACCIDENT MONITORING INSTRUMENTATION & SURVEILLANCE REQUIREMENTS

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the unavailability of the instrumentation will not prevent the PASS from performing its design function. Additionally the proposed change does not represent a change to plant design. Hence no new or different accident possibilities are introduced with this change.
- 3) Involve a significant reduction in a margin of safety because as discussed above the subject instruments do not contribute to the functional bases of the PASS and serve no significant function during post accident conditions. Hence no safety margins are reduced by removing them from the Technical Specifications.

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

PLP/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: REQUEST FOR AMEND.
T.S. TABLE 3.3.7-5-1
4.3.7.5-1

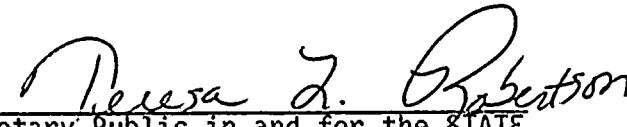
I, G. C. Sorensen, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information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

DATE 23 June, 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 23rd day of June 1989.


Notary Public in and for the STATE
OF WASHINGTON

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

