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SUBJECT: Requests temporary relief from TS surveillance requirement
4.3.1.3, Table 3.3.1-2, Item 2.b.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 5, 1989
G02-89-152

Docket No. 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
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Washington, D.C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO 2
 REQUEST FOR TEMPORARY RELIEF FROM TECHNICAL
 SPECIFICATION SURVEILLANCE REQUIREMENT
 4.3.1.3, TABLE 3.3.1-2, ITEM 2.b

The purpose of this letter is to request relief from the Technical Specification surveillance requirements applicable to the Average Power Range Monitor flow biased simulated thermal power upscale function.

Table 3.3.1-2 states that the RPS response time of this function is to be measured at less than or equal to (LE) 0.09 seconds, not including the simulated thermal power time constant of 6 ± 1 seconds. This requires that the 0.09 second limit be measured independently of the 6 second simulated thermal power time constraint.

Present WNP-2 surveillance procedures, PPM 7.4.3.1.3.5, .6, .7 and .8 and the plant design do not provide for independent measurement of these two values.

The PPM requires that the measured time response be less than or equal to 7.09 seconds. The values measured have been in the range of 5.5 to 6.0 seconds. Thus, there is not a safety concern in that the total delay, which is the value of significance is being maintained. Also, there are no safety analysis that take credit for this function.

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REQUEST FOR TEMPORARY RELIEF FROM TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 4.3.1.3, TABLE 3.3.1-2, ITEM 2.b

However, as the cited Technical Specifications require the RPS response time of LE 0.09 seconds be measured separately, the Supply System is not in strict compliance with the Technical Specifications. As the plant design does not provide for direct measurement of this time delay the plant has been forced into Action 4 of Table 3.3.1-1 that requires the plant be in at least startup within 6 hours.

As the above mentioned surveillance procedures have as an acceptance criterion a total time delay of less than 7.09 seconds, which is being maintained, and because this function is not taken credit for in any safety analysis, we believe that the plant can continue to be operated safely.

We plan to submit an emergency technical specification change request to provide for surveillance of the simulated and RPS delay as one value similar to that required by the Fermi, Unit 2 technical specifications.

To prevent a forced shutdown of WNP-2 the requested relief will be required by 6:30 P.D.T September 5, 1989.

Very truly yours,



C. M. Powers,
WNP-2 Plant Manager

AGH/bk

cc: JB Martin, NRC RV
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