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SUBJECT: Application for amend to License NPF-21,revising Tech Spec 3/4.3.1.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 14, 1989
G02-89-161

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 3/4.3.1 REACTOR PROTECTION SYSTEM INSTRUMENTATION AND CLOSEOUT OF ITEM 4.5.3 OF GENERIC LETTER 83-28

Reference:

1) GE Topical Report NEDC-30851P-A, "Technical Specification Improvement Analyses for BWR Reactor Protection System", dated March 1988
2) Letter, AC Thadani (NRR) to TA Pickens (BWROG) "General Electric Company (GE) Topical Reports NEDC-30844, "BWR Owners Group Response to NRC Generic Letter 83-28", and NEDC-30851P, "Technical Specification Improvement Analysis for BWR RPS", dated July 15, 1987
3) GE Topical Report NEDC-30844A, "BWR Owners Group Response to NRC Generic Letter 83-38, Item 4.5.3", dated March 1988.
4) Letter, CE Rossi (NRR) to RF Janccek (BWROG) "Staff Guidance for Licensee Determination that the Drift Characteristics for Instrumentation Used in RPS Channels are Bounded by NEDC-30851P Assumptions When the Functional Test Interval is Extended from Monthly to Quarterly", dated April 27, 1988.
5) GE Report MDE-88-0485, DRF A00-02119-D "Technical Specification Improvement Analysis for the Reactor Protection System for Washington Public Power Supply System Nuclear Project No. 2", dated April 1985

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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 section be modified, as shown in Attachment 1, to incorporate Reactor Protection System (RPS) surveillance frequencies and outage times recommended in Reference 1) and approved by the Staff in Reference 2). The proposed changes optimize surveillance intervals for improved RPS reliability and increase allowable outage times (AOTs). As shown in Reference 1) the increase in AOTs has negligible impact on RPS failure frequency yet allows more time for repair and decreases the potential for unnecessary plant shutdown. Additionally, as recommended by the Staff in Reference 2) this letter provides the necessary confirmation and demonstration to closeout item 4.5.3 of Generic Letter 83-28 (Salem ATWS).

The Supply System as a member of the BWR Owners Group endorses the analysis submitted in references 1 and 3. Reference 3) (NEDC-30844A) provides a technical basis for ensuring that current RPS on-line test intervals meet the recommendations of Generic Letter 83-28, Item 4.5.3. Reference 1) (NEDC-30851PA) uses the base results from Reference 3) to establish justification for extending the current RPS on-line test intervals and AOTs based on fault tree modeling and reliability analyses for estimations of RPS failure frequency. Sensitivity analyses were used to assess the impact of the Item 4.5.3 (Generic Letter 83-28) areas of concern to assure the areas were accounted for in any proposed technical specification (TS) changes.. Acceptance of a proposed change was based on net decrease of risk. Risk increase was based on the potential of not experiencing an RPS actuation due to not testing as frequently because of the larger surveillance intervals. Decreases in risk resulted from the reduced likelihood of inadvertent scrams and equipment failed due to excessive testing. If the net change in risk was determined to be insignificant the TS change was acceptable. Reference 2) provided an NRC Safety Evaluation Report of both documents and provided the following guidance in Table 1 of the SER:

> "For plant-specific application of the TS changes proposed, and for plant-specific closeout of Item 4.5.3 of Generic Letter 83-28, an individual licensee for a plant using a relay RPS must:
>
> 1) Confirm the applicability of the generic analysis to its plant.
>
> 2) Demonstrate, by use of current drift information provided by the equipment vendor or plant-specific data, that the drift characteristics for instrumentation used in RPS channels in the plant are bounded by the assumption used in NEDC-30851P when the functional test interval is extended from monthly to quarterly.

3) Confirm that the differences between the parts of the RPS that perform the trip functions in the plant and those of the base case plant were included in the analysis for its plant done using the procedures of Appendix K of NEDC-30851P (and the results presented in Enclosure 1 to letter OG5-491-12 from L. Rash (GE) to T. Collins (NRC) dated November 25, 1985), or present plant-specific analyses to demonstrate no appreciable change in RPS availability or public risk."

Accordingly, in response to condition I the Supply System confirms that the generic analysis for relay plants provided in references 1, and 3 are applicable to WNP-2.

Additional clarification of condition 2 was provided in Reference 4) such that:

"To address the setpoint drift issue in the amendment proposals to extend STIs, licensees need only confirm that the setpoint drift which could be expected under the extended STIs has been studied and either (1) has been shown to remain within the existing allowance in the RPS and ESFAS instrument setpoint calculation or (2) that the allowance and setpoint have been adjusted to account for the additional expected drift. No additional information need be provided for staff review. However, records showing the actual setpoint calculation and supporting data should be retained onsite for possible future staff audit."

In response the Supply System has reviewed WNP-2 plant specific setpoint drift characteristics of the subject TS change RPS equipment and confirmed that the setpoints will remain within existing allowances throughout the requested surveillance test interval extensions.

General Electric report MDE-88-0485 (Reference 5) provides a plant specific analysis to address the differences between the base case plant evaluated in NEDC-30851P and WNP-2. This analysis was done per Appendix K of NEDC-30851P and satisfies condition 3 above in that plant specific characteristics do not represent an appreciable change in RPS availability or public risk.

Appropriate detailed justification for each of the proposed changes is provided in Reference 1) (NEDC-30851P) which were in turn found acceptable by the Staff in Reference 2). Further the proposed TS changes represent an optimization of testing targeted at reduction of RPS failures. As such the changes represent improvement in RPS operability and, as stated in section 5.7.4 of Reference 1) represent a decrease in core damage frequency.

The Supply System concurs with the significant hazards assessment put forth in section 5.7.4 of Reference 1) and provides the following in addition:

1) The proposed changes do not involve a significant increase in the probability or consequences of an accident previously evaluated because the changes have been shown to have insignificant impact to overall RPS failure rates and operability. As shown by NEDC 30851P and the corresponding plant specific analyses, the changes do not degrade the reliability of the RPS. Hence the probability or consequences of previously evaluated accidents are not significantly increased due to this change. To the contrary as stated in section 5.7.4 the changes represent a decrease in core damage frequency.

2) The proposed changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because RPS function and reliability are not degraded by these changes. No new modes of plant operation are introduced with these changes. No new or different kind of accident is credible.

3) The proposed changes do not involve a significant reduction in a margin of safety because as shown in Reference 1) and GE report MDE-88-0485 (Reference 5) and found acceptable by the Staff in Reference 2) the changes represent an overall decrease in core melt frequency. As such the margin of safety is enhanced by the proposed changes.

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 cummulative 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: Technical Specification Improvement Analysis for WNP-2

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. The attached report MDE-88-0485 is considered by the General Electric Company as proprietary information. This report is treated as proprietary information by the Supply System. It is requested that said report be withheld from public disclosure under 10CFR 2.790.

DATE 14 SEPT, 1989

G. C. Sorensen, Manager
Regulatory Programs

On this day personally appeared before me G. C. Sorensen to me know to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed fro the uses and purposes herein mentioned.

GIVEN under my hand and seal this 14th day of September 1989.

Teresa L. Robertson
Notary Public in and for the
STATE OF WASHINGTON

Residing at Richland, WA