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SUBJECT: Application for amend to License NPF-21, revising TS 3.4.6.1  
 re pressure/temp limits.

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October 27, 1989  
G02-89-201

Docket No. 50-397

U. S. Nuclear Regulatory Commission  
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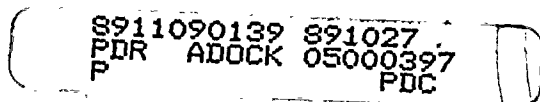
Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION  
PRESSURE/TEMPERATURE LIMITS - SECTION 3.4.6.1

Reference: Generic Letter 88-11, "NRC Position on Radiation  
Embrittlement of Reactor Vessel Materials and its  
Impact on Plant Operations", dated July 12, 1988

In accordance with the Code of Federal Regulations Title 10, Parts 50.90 and 2.101, the Supply System hereby requests an amendment to Section 3.4.6.1 of the Technical Specifications. Specifically, the Supply System is submitting changes to the technical specification and supporting bases resulting from the implementation of Regulatory Guide 1.99, "Radiation Embrittlement of Reactor Vessel Materials", Revision 2, methodologies as directed by the referenced generic letter. The generic letter directs licensees to complete technical analysis using methods described in the recently revised Regulatory Guide to ensure continued compliance with the requirements of Section V of 10CFR Part 50, Appendix G. Accordingly the Supply System has completed the technical analysis and the attached technical specification and bases changes result from that analysis and are required to maintain compliance with Appendix G. These changes are being submitted to ensure compliance with the changes promulgated by Revision 2 to Regulatory Guide 1.99.

The attached Figure 3.4.6.1 in compliance with Title 10 of the Code of Federal Regulations, Part 50, Appendix G and H is submitted to replace the reactor pressure vessel pressure/temperature limit curves represented by Technical Specification Figures 3.4.6.1-1 and 3.4.6.1-2. The Supply System is submitting one figure for review. This figure reflects the End-of-Life (EOL) operational limits for WNP-2's reactor pressure vessel. Figure 3.4.6.1-1 is no longer considered applicable since WNP-2 has passed 3 effective full-power years of operation.



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REQUEST FOR AMENDMENT TO TS PRESSURE/TEMPERATURE LIMITS SECTION 3.4.6.1

The attached figure has been updated incorporating the requirements of Regulatory Guide 1.99 Revision 2. The new curves on the revised Figure 3.4.6.1 were developed utilizing the revised Regulatory Guide criteria on irradiation damage. Both the RPV beltline and feedwater nozzle regions were assessed and are reflected in the new curves. Calculations were completed in compliance with SRP 1.70, Section III ASME Code and Summer 1972 Addenda Appendix G and Welding Research Council Bulletin 175. Changes to the text of Specification 3/4.4.6 and the List of Figures have been made to reflect the replacement of Figures 3.4.6.1-1 and 3.4.6.1-2 by the revised figure now numbered 3.4.6.1.

As Figure 3.4.6.1-1 is no longer applicable to WNP-2 its deletion is not addressed in the following no significant hazards analysis.

The Supply System has evaluated this amendment request per 10CFR 50.92 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.

The proposed amendment reflects shifts in the pressure temperature limit curves to values which are more conservative than those presently in use. The methodology used to derive these values is recognized by the NRC and Industry as providing acceptable margins. Hence the probability of a previously evaluated accident is not impacted by these changes but remains at an acceptable value. Higher temperature values for corresponding pressures further reduce brittle fracture possibilities. Nor do these changes increase the consequences of an accident in that the pressure temperature shift is well within all equipment operating margins.

- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated.

These changes, as described above, are more conservative yet well within any upper bound limit. No new modes of plant operation result from these changes. The only changes will be in operation of the plant within more conservative limits. As such no new or different kind of accident is credible.

- 3) Involve a significant reduction in a margin of safety.

As described in 1) above these changes reflect the application of methodologies recognized by the NRC and Industry as providing a sufficient margin of safety. The shift in limits is more conservative than values presently in use but within any upper bound limits. Hence no reduction in a margin of safety is credible with the approval of these changes.

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REQUEST FOR AMENDMENT TO TS PRESSURE/TEMPERATURE LIMITS SECTION 3.4.6.1

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 exclusions 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 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.

This submittal satisfies the 180 day submittal requirement of the generic letter. Further, per the generic letter, in order for WNP-2 to remain in compliance with 10CFR Part 50 Appendix G approval of the proposed amendment is required within 2 plant outages of the effective date of Revision 2 to Regulatory Guide 1.99. Accordingly with the Regulatory Guide effective May 1988 this change must be approved no later than commencement of initial heat up at the end of the WNP-2 1990 refueling outage tentatively scheduled for May 24, 1990.

Very truly yours,

  
G. C. Sorensen, Manager  
Regulatory Programs

PLP/bk  
Attachments

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

STATE OF WASHINGTON )  
 )  
COUNTY OF BENTON )

Request for Amend to TS Pressure/  
Subject: Temperature Limits Section 3.4.6.1


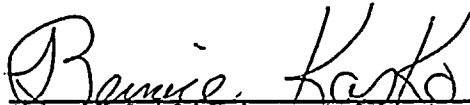
I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information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

DATE 27 Oct., 1989

  
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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 27th day of October, 1989.

  
  
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Notary Public in and for the  
State of Washington  
Residing at Kennecott, Wa