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 SORESEN, G.C. Washington Public Power Supply System
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SUBJECT: Application for amend to License NPF-21, changing Tech Spec
 Surveillance Requirement 4.8.1.1.2.d.2.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

January 4, 1990
G02-90-004

Docket No. 50-397

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

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT 4.8.1.1.2.d.2

Reference: Letter, G02-90-003, CM Powers to NRC, "Request for
Temporary Relief from Technical Specification
Surveillance Requirement 4.8.1.1.2.d.2", dated 1/3/90

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90, 2.101 and 50.91(a)(5), the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications on an emergency basis as provided for in the regulations. Specifically, the Supply System is requesting that Technical Specification 4.8.1.1.2 be revised as attached to modify the emergency diesel generators fuel oil testing requirements.

The reference requested a temporary relief from this Technical Specification requirement based upon results received on January 2, 1990 by our contract laboratory that indicated impurity levels equal to and greater than 2.0 mg/100 ml (the Technical Specifications limit is less than 2.0 mg/100 ml). Justifications were presented in the reference as to why this situation did not raise any concerns for the safe operation of the plant. Subsequent testing of the fuel from all three tanks to ASTM D2276-78 confirmed the justifications presented.

A second set of test results of the original sample received on January 3 also indicated the Technical Specification limit was exceeded for two of the three tanks. As a result, Plant management determined that strict compliance to the Technical Specifications was not being satisfied. Therefore Section 3.0.3 was entered at 3:45 p.m. PDT on January 3 and plant shutdown was initiated to be in at least Startup by 10:45 p.m. At 6:34 p.m. the NRC granted enforcement discretion from the subject Technical Specification requirement until noon January 4, 1990. As a result, Section 3.0.3 was exited at 6:40 p.m. This enforcement discretion was later extended until 6:00 p.m. January 5, 1990.

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On January 4, the NRC requested the submittal of a Technical Specification change request on an emergency basis to resolve this concern by adopting the ASTM D2276-78 standard in lieu of ASTM D2274-70.

The Technical Specification change request, if approved, would delete the current requirement to test stored fuel at least once per 92 days in accordance with ASTM D2274-70. It would add the requirement to test stored fuel at least once per 31 days in accordance with ASTM D2276-78 and verify that the total particulate contamination is less than 10 mg/liter when checked in accordance with ASTM D2276-78, Method A.

This change to incorporate ASTM D2276-78 in lieu of ASTM D2274-70 would adopt a testing method that is more effective in detecting unsatisfactory fuel oil as it is delivered to the diesels in that its purpose is to detect particulate matter that could impair diesel generator operation or result in diesel generator unavailability.

The ASTM D2274-70 test is performed under an extreme testing environment and the results are only indicative of the tendency of the fuel oil to oxidize and form particulates during long term storage and does not detect particulates that may already exist. The ASTM D2276-78 tests will be performed on a 31 day basis which will provide closer monitoring of fuel conditions.

The Supply System has evaluated this amendment request per 10CFR 50.92 and has determined that it does not represent a significant hazard because it does not:

- 1) Involve a significant increase in the probability or consequence of an accident previously evaluated. The diesel generators are transient and accident mitigating features and as such do not have the potential to increase the probability of an accident previously evaluated. The proposed change to ASTM D2276-78 and the increased surveillance frequency will increase the reliability of the diesels and, as such, the mitigating feature of the diesels is enhanced.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Testing to ASTM D2276-78 is a superior method of determining fuel oil quality and as such the diesel reliability is not degraded and the possibility of new or different kinds of accidents is not presented.
- 3) Create a significant reduction in a margin of safety. The proposed change to ASTM D2276 and the increased surveillance frequency will result in improved diesel reliability and, as such, there is no reduction in the margin of safety.



It is also significant that we are not proposing a change to the plant design but only a change to the diesel fuel oil testing used to confirm system operability.

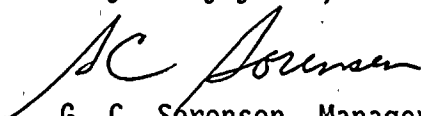
As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does it involve a significant increase 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.

In summary, based on the assertion that no significant hazard is created by the proposed amendment and that the proposed change provides for improved diesel fuel oil testing, we believe approval of the proposed amendment does not represent an undue risk to the health and safety of the public. Additionally, absent this amendment and expiration of the above mentioned NRC short-term relief, with the current ASTM D2274 results the WNP-2 plant will be required to commence shutdown.

As previous analyses have provided results by ASTM D2274 in the range of 0.6 to 1.0 we were not in the position to anticipate the need for this request and therefore did not process it on a non-emergency basis.

This amendment request has been reviewed and approved by the WNP-2 Plant Operating 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

AGH/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
Subject: Surveillance Requirement 4.8.1.1.2.d.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.

DATE 4 JAN, 1990

G. C. Sorensen
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 4th day of January, 1990.

Bernice Lasko
Notary Public in and for the
State of Washington

Residing at Kennebec