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ACCESSION NBR: 9001190100 DOC. DATE: 90/01/09 NOTARIZED: YES DOCKET #  
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 RECIP. NAME: RECIPIENT AFFILIATION: Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-21, revising Tech Spec Table 4.3.7.12-1.

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*J. Bradfute - p05*

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

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January 9, 1990  
G02-90-005

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  
TABLE 4.3.7.12-1, RADIOACTIVE GASEOUS EFFLUENT  
MONITORING INSTRUMENTATION SURVEILLANCE REQUIREMENTS

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby submits a request for an amendment to the WNP-2 Technical Specifications. Specifically, the Supply System is requesting that note (4) applicable to the channel check for item 5.d, Effluent System Flow Rate Measurement Device, be revised as attached. This is requested so that the channel check function may be more accurately completed.

Note (4) states: "The CHANNEL CHECK shall be performed by comparing computer readings...." A recent audit of compliance to technical specifications identified that the computer readings of the Effluent System Flow Rate Measurement device are based on only one value. Given a single value as a sample point, comparison of two computer readings from the same sample point does not meet the intent of a channel check surveillance.

The following describes how the signal is created. The Radwaste Building Exhaust System has three 50% capacity exhaust filter units, each exhausting directly to atmosphere. Normal operation has two units running with the third in standby. Each unit has a power sensing device that provides a power signal that is summed and provided as a sum to the plant computers. The single summed signal is then converted to flow rate for display and input to the history file. Local readouts are not provided. As such "comparing computer readings" as directed by Note (4) serves no legitimate channel check function. The definition of channel check is "the qualitative assessment of channel behavior during operation by observation. This determination shall include, where possible, comparison of the channel indication and/or status with other indications and/or status derived from independent instrument channels measuring the same parameter." The Note (4) direction to "compare computer readings" does not satisfy the requirement that the instrument channels being compared be independent.

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REQUEST FOR AMEND. TO TS TABLE 4.3.7.12-1  
RADIOACTIVE GASEOUS EFFLUENT MONITORING  
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Note (4) also directs that the channel check can be performed by "comparing each fan's local amperage readings." Again this cannot be done as local amperage readings are not available without requesting installation of a portable current sensing device. The design does not provide a continuous readout of fan amperage. Use of a portable instrument in the fan motor circuitry is presently the only way to obtain fan motor amperage. The channel check definition specifies "assessment of channel behaviors by observation." The insertion of a portable instrument is not within the intent of the channel check definition. Further a comparison of each fan's local amperage does not compare actual building exhaust against an independent measurement of the same parameter. Rather, it compares some portion of building exhaust against the remaining portion. To accurately reflect building exhaust the summation of individual fan power must be recognized in the CHANNEL CHECK. Should the computer output signal not be available, a power signal reading can be obtained from the circuitry inputting to the plant computers to satisfy the CHANNEL CHECK. Note (4) has been modified to include this option.

The proposed revision of Note (4) provides guidance meeting the intent of the channel check definition. Baseline flow rate values will be provided for one, two or three fans running so that a comparison of actual flow rate value can be made against expected values. The baseline values were developed using temporary portable instrumentation in the exhaust ducts for flow rate measurement. Hence, the baseline values are truly independent measurements and their use will satisfy the channel check definition and requirement.

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 channel check confirms operability of the ventilation exhaust filter units daily. If the ventilation exhaust filter units were to malfunction the present channel check, comparison of computer readings based on one value, would not alert an operator of a problem unless the operator had some knowledge of expected values. However the proposed channel check would compare baseline values (expected) against a value obtained from the malfunctioning units. Hence an operator with no prior knowledge of expected values would be alerted to a problem. Therefore any malfunction of the units that could impact the probability or consequences of an accident would have a higher probability of recognition using the proposed channel check method. As such the proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. Ventilation exhaust filter operation remains unaffected. No new modes of operation or system design are represented in this change. Rather, malfunction of equipment will be more readily apparent. Hence this change does not create a possibility of a new or different kind of accident from any previously evaluated.

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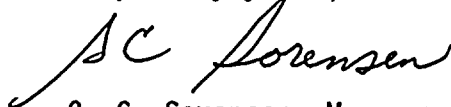
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INSTRUMENTATION SURVEILLANCE REQUIREMENTS

- 3) Involve a significant reduction in a margin of safety. As discussed above the probability of discovering a malfunction is enhanced by the proposed change. Therefore a reduction in a margin of safety as a result of the proposed change is not possible.

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: 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 )

Subject: REQUEST For Amend  
T.S. TABLE 4.3.7.12-1

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 8 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 8<sup>th</sup> day of January 1990.

Robert Z. Robertson  
Notary Public in and for the  
STATE OF WASHINGTON

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



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