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SUBJECT: Application for amend to License NPF-21,revising TS 3.3.7:5 re accident monitoring instrumentation.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 18, 1990
G02-90-078

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
3.3.7.5 ACCIDENT MONITORING INSTRUMENTATION**

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 an exception to the provisions of Specification 3.0.4 be allowed during periods when one or more accident monitoring instrumentation channels (LCO 3.3.7.5) are inoperable.

The operability of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of Reg. Guide 1.97 and NUREG-0737. These instruments are not required to perform any automatic function, and no specific credit is taken for their function in any accident analyses. Due to the passive function of these instruments and the operator's ability to respond to an accident utilizing alternate instruments and methods for monitoring, the Supply System finds it appropriate to allow the operation of the unit, including startup and power increase into the Run Mode, provided the allowed outage time for an inoperable instrument is not exceeded.

Circumstances arise where an accident monitoring instrumentation channel is discovered inoperable and can not be restored operable prior to commencing a scheduled startup or transition into Run Mode. The economic impact of not allowing the unit to proceed to power in this instance, poses undue hardship. Power operation would be allowed to continue if the inoperability occurred while at power. The process of startup and power escalation does not create a greater need for these instruments to be operable.

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These instruments receive the highest level of maintenance priority. They are not routinely allowed to remain inoperable longer than reasonably necessary to accomplish repairs. The Supply System will continue to maintain this highest level of priority for maintenance on inoperable accident monitoring instrumentation. Changes in operational conditions with inoperable accident monitoring instrumentation, which would be allowed by this amendment request, would not be made without first assessing the ability to repair the instrumentation prior to changing conditions. Furthermore, the prospect of not completing the repair prior to expiration of the allowed outage time (which would result in a required shutdown) will be assessed so as not to intentionally start up knowing a subsequent shutdown will be required.

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.

   This instrumentation provides no automatic function and does not serve to maintain any plant condition assumed at the onset of, or as a precursor to, any accident. Therefore the probability of a previously evaluated accident is not increased.

   The consequences of previously evaluated accidents are maintained by various engineered safety features. Operator response during an event is based on Emergency Operating Procedures and available information regarding plant status. The accident monitoring instrumentation is provided to assist the operator in this assessment. This amendment request does not modify this instrumentation or allow inoperable accident monitoring instrumentation to exist beyond the period allowed in the currently approved WNP-2 Technical Specifications. Allowing a start up to commence or continue without all the accident monitoring instrumentation operable, per this amendment request, does not increase the consequences of an accident beyond that which is allowed with these instruments inoperable at full steady state power. Changing plant conditions within the bounding conditions of previously analyzed accidents will not increase the accident's consequences beyond those previously analyzed.

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

   As this instrumentation provides no automatic function and does not serve to maintain the plant condition, the change also does not create the possibility of a new or different kind of accident.

Operation with inoperable accident monitoring instrumentation is currently approved for a limited period of time. Neither the operability requirements nor the allowed out-of-service time is being changed. Maintenance priorities for the inoperable accident monitoring equipment remain unchanged. Allowing a start up to commence or continue without all the accident monitoring instrumentation operable, per this amendment request, does not create the possibility of an accident different than that which has previously been evaluated with these instruments inoperable during continuous operation in startup or run mode. Changing plant conditions within the bounding conditions of previously analyzed accidents will not create the possibility of a new or different kind of accident.

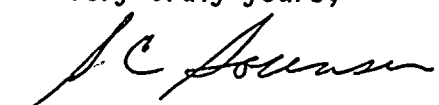
3) Involve a significant reduction in a margin of safety.

The margin of safety maintained by the limited allowed out-of-service times for accident monitoring instrumentation remains unaffected. The maintenance priorities for inoperable accident monitoring instrumentation also remain unaffected. The action of commencing or proceeding with unit startup with this inoperable equipment does not significantly decrease the margin of safety compared to continuous operation in Startup or Run Mode.

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. to T.S. 3.3.7.5
Accident Monitoring Instrumentation

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 18 April, 1990

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 18th day of April, 1990.

Notary Public in and for the
State of Washington

Residing at Kennewick, Wa