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SUBJECT: Application for amend to License NPF-21, implementing Generic Ltr 88-16.

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A/A-21

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 2, 1990
G02-90-132

Docket No. 50-397

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

Subject: NUCLEAR PROJECT NO. 2; OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
IMPLEMENTATION OF GENERIC LETTER 88-16

Reference: Generic Letter 88-16, "Removal of Cycle-Specific Parameter
Limits from Technical Specifications"; USNRC, dated October 4,
1988

Gentlemen:

In accordance with the Code of Federal Regulations; Title 10; Parts 50.90 and 2.101, the Supply System hereby requests an amendment to the WNP-2 Technical Specifications. Generic Letter 88-16 (see reference) provides guidance for the preparation of a license amendment request to remove values of cycle-specific parameter limits from plant Technical Specifications. Affected specifications are those associated with reactor parameters that generally change with each reload core. The Generic Letter provides guidance on the formulation of these limits into a CORE OPERATING LIMITS REPORT (COLR) which is developed for each fuel cycle. Changes to the following Technical Specifications are being requested:

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1.0 Definitions

- 3/4.2.1 Average Planar Linear Heat Generation Rate
- 3/4.2.3 Minimum Critical Power Ratio
- 3/4.2.4 Linear Heat Generation Rate
- 3/4.4.1 Recirculation System
- B3/4.2.1 Average Planar Linear Heat Generation Rate
- B3/4.2.3 Minimum Critical Power Ratio
- 6.9 Reporting Requirements

Marked up Technical Specifications, Attachment I; and the proposed WNP-2 Cycle 6 COLR, Attachment II, are enclosed for your review and approval. Taken together, they provide the basis for the proposed no significant hazards determination.

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Generic Letter 88-16 states that a COLR should include the values of cycle-specific parameter limits that have been established using an NRC-approved methodology. In the proposed Technical Specification changes (Attachment I), Section 6.9, Reporting Requirements; Subsection 6.9.3.2 lists the analytical methods used to determine the core operating limits specified in the proposed WNP-2 Cycle 6 COLR (Attachment II). All of these methods have been approved except Item 8; ANF-89-014(P), "Generic Mechanical Design for ANF 9x9-IX and 9x9-9X BWR Reload Fuel". This document was submitted to the NRC in May 1989 and Supplement 1 submitted for NRC review and approval in June, 1990.

As specified in the proposed Technical Specifications Section 6.9.3.4 (see Attachment I), a copy of the COLR, including any mid-cycle changes, will be provided upon issuance for each reload cycle to the NRC. Controlled copies of the COLR will be maintained at WNP-2 and will be revised in accordance with future WNP-2 fuel cycles.

The Supply System has reviewed the proposed Technical Specifications changes and concludes that they do not involve an unreviewed safety question. The Supply System has also evaluated this request in accordance with 10CFR50.92 and determined that it does not:

1. Involve a significant increase in the probability or consequences of an accident previously evaluated. There is no physical change to the plant involved in this activity. The current approved safety analysis is still applicable. The only changes are to administratively move certain cycle specific thermal limits from the Technical Specifications to the proposed COLR and to add two low flow points (20% and 30% rated core flow) to the reduced flow MCPR curve provided as Figure 9 of the proposed COLR. The data points added exist in the WNP-2 core monitoring system. These data points were developed with the same NRC approved methodology utilized to develop the other points on the reduced flow MCPR curve. By adding the low flow points, the COLR reduced flow MCPR curve is consistent with the data used to monitor plant operation.

The removal of the cycle-specific core operating limits from the WNP-2 Technical Specifications has no impact on the probability of a design basis accident occurrence. The cycle-specific core operating limits will be followed in the operation of WNP-2. The proposed amendment requires the same actions to be taken as would be taken if current Technical Specifications limits are exceeded.



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Each accident analysis addressed in the WNP-2 Final Safety Analysis Report (FSAR) will be examined with respect to changes in cycle-dependent parameters, which are obtained from application of the approved reload design methodologies, to ensure that the transient evaluation of new reloads are bounded by previously accepted analyses. This examination, which will be performed per requirements of 10CFR50.59, ensures that future reloads will 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 previously evaluated. There is no change to the plant or the premises of the approved safety analysis whose conclusions still apply.

The removal of the cycle-specific variables has no influence; nor does it contribute in any way to the creation of a new or different kind of accident. The cycle-specific variables are calculated using NRC approved methods. The Technical Specifications will continue to require operation within the required core operating limits and appropriate actions will be taken when or if limits are exceeded.

3. Create a significant reduction in the margin of safety. The margin of safety previously defined by the approved Cycle 6 safety analysis is still applicable. The margin of safety is not changed because the action here is an administrative move of the cycle-specific core thermal limits from the Technical Specifications to the Core Operating Limits Report.

The margin of safety presently provided by current Technical Specifications remains unchanged. The proposed amendment still requires operation within the core limits as obtained from NRC approved reload design methodologies and appropriate actions to be taken when or if limits are violated remain unchanged.

The development of the limits for future reloads will continue to conform to those methods described in NRC approved documentation. In addition, each future reload will involve completing a safety evaluation in accordance with 10CFR50.59 to assure that operation of the unit within the cycle-specific limits will not involve a significant reduction in a margin of safety.

As discussed above, the Supply System considers that this change does not involve a significant hazard 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 10CFR51.22(c)(9) and therefore; per 10CFR51.22(b); an environmental assessment of the change is not required.

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IMPLEMENTATION OF, GENERIC LETTER 88-16

These Technical Specifications changes have been approved by the WNP-2 Plant Operations Committee (POC) and reviewed by the Supply System Corporate Nuclear Safety Review Board (CNSRB).

Very truly yours,



G. C. Sorensen, Manager,
Regulatory Programs

WCW:bw

Enclosures

Attachment I: Proposed Technical Specification Changes
Attachment II: Proposed WNP-2 Cycle 6 Core Operating Limits Report

cc: JB Martin - NRC RV
NS Reynolds - BCP&R
PL Eng - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A
CR Wallis - EFSEC



STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: REQUEST FOR AMENDMENT
IMPLEMENTATION OF GL 89-16

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: 1 August, 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 1st day of August 1990.

Debra J. Robertson
Notary Public in and for the
STATE OF WASHINGTON

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



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