

# ACCELERATED DISTRIBUTION DEMONSTRATION SYSTEM

## REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9101240078    DOC. DATE: 91/01/18    NOTARIZED: YES    DOCKET #  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe    05000397  
 AUTH. NAME    AUTHOR AFFILIATION  
 SORESEN, G.C.    Washington Public Power Supply System  
 RECIP. NAME    RECIPIENT AFFILIATION  
                  Document Control Branch (Document Control Desk)

SUBJECT: Application for amend to License NPF-21, revising TS 3/4.7.4  
 to approve implementation of snubber visual insp intervals &  
 corrective actions recommended by Generic Ltr 90-09.

DISTRIBUTION CODE: A001D    COPIES RECEIVED: LTR 1 ENCL 1    SIZE: 448  
 TITLE: OR Submittal: General Distribution

### NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD5 LA	1 1	PD5 PD	1 1
	ENG, P.L.	2 2		
INTERNAL:	ACRS	6 6	NRR/DET/ECMB 9H	1 1
	NRR/DET/ESGB	1 1	NRR/DOEA/OTSB11	1 1
	NRR/DST 8E2	1 1	NRR/DST/SELB 8D	1 1
	NRR/DST/SICB 7E	1 1	NRR/DST/SRXB 8E	1 1
	NUDOCS-ABSTRACT	1 1	OG/LEMB	1 0
	OGC/HDS2	1 0	<u>REG FILE</u> 01	1 1
	RES/DSIR/EIB	1 1		
EXTERNAL:	NRC PDR	1 1	NSIC	1 1

### NOTE TO ALL "RIDS" RECIPIENTS:

PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,  
 ROOM P1-37 (EXT. 20079) TO ELIMINATE YOUR NAME FROM DISTRIBUTION  
 LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 24 ENCL 22

*Handwritten signature/initials*



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

January 18, 1991  
G02-91-09

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 3/4.7.4  
(SNUBBERS) AS RECOMMENDED BY GENERIC LETTER 90-09

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90, and 2.101, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications. Specifically, the Supply System is requesting that the snubber visual inspection intervals and corrective actions recommended by Generic Letter 90-09 be approved for implementation on WNP-2 (as attached). As stated in the generic letter adaptation of these recommended changes "will reduce future occupational radiation exposure and is highly cost effective" and is "consistent with the Commission's policy on Technical Specification Improvements."

The generic letter recognizes that the existing snubber inspection schedule which determines actions based on the number of failed snubbers, irrespective of the snubber population, is overly restrictive. For plants such as WNP-2 with a large population of snubbers the present inspection and corrective action schedule represents a significant impact in comparison to plants with a relatively low snubber population. Further, statistically, it prompts corrective action and significant manpower expenditure and radiation exposure at a threshold much lower than would be encountered on a plant with a small number of snubbers. The staff, in issuing the generic letter, proposes a visual inspection and corrective action schedule that accounts for plants with a large number of snubbers. The Supply System has reviewed the recommended visual inspection and corrective action schedule and concurs with the staff evaluation that the alternate schedule maintains the same required confidence level as the existing schedule.

9101240078 910118  
PDR ADOCK 05000397  
PDR

230130

Aod  
11

REQUEST FOR AMENDMENT TO TECHNICAL  
SPECIFICATION 3/4.7.4 (SNUBBERS)

As directed by paragraph b. of the proposed change, the inspection interval established by the present inspection schedule (12 months for WNP-2) combined with the criteria specified in the attached table to Generic Letter 90-09 (TABLE 4.7-2, SNUBBER VISUAL INSPECTION INTERVAL) and the number of failures in the last inspection (one) determine the next inspection interval. Using this guidance the next inspection interval upon implementation of this change at WNP-2 is 24 months.

Accordingly, the Supply System requests that the alternate schedule, as recommended by the staff in Generic Letter 90-09, be approved for use at WNP-2. The alternate schedule has been reviewed by the Supply System and found to be appropriate for WNP-2. The inspection history to date at WNP-2 has been exceptionally good with one failure in each of the last two outages (1989 [749 snubbers inspected] and 1990 [675 snubbers]) and no failures in the three previous outages (1986 [827 snubbers], 1987 [815 snubbers] and 1988 [796 snubbers]). With this history and the large number of snubbers at WNP-2, implementation of the alternate schedule will avoid a significant expenditure of manpower and radiation exposure while maintaining an acceptable level of confidence for snubber operability.

The Supply System has evaluated this change 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 since the change preserves the same level of confidence for snubber operability, in a large population, as does the present snubber inspection schedule. With no change in snubber operability confidence level there is no increased possibility for snubber failure and subsequent 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 because operation of the plant remains unaffected. This change introduces no new modes of operation of any equipment. Nor does it require physical modification to the plant. Because the required confidence level for snubber operability remains unaffected and no different operation of the plant is imposed this change does not create the possibility of a new or different kind of accident from any accident previously evaluated.
- 3) Involve a significant reduction in a margin of safety. This change, as recognized by the staff in Generic Letter 90-09 and concurred with by the Supply System does not affect the required confidence level of snubber operability. Therefore with no reduction in snubber operability no reduction in a margin of safety is credible. Further, implementation of the alternate schedule is significantly beneficial in that it reduces exposure in keeping with ALARA goals and allows resources to be better utilized. With implementation of this change critical manpower that would be otherwise employed in an overly excessive inspection program can be used on other projects having potentially more safety significance to plant operations. From this standpoint implementation of this change represents an enhancement to plant operation.



REQUEST FOR AMENDMENT TO TECHNICAL  
SPECIFICATION 3/4.7.4 (SNUBBERS)

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 amendment request 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.

Although not addressed in Generic Letter 90-09, Supply System review of the bases indicates that a change to the bases is appropriate to preserve the intent of the Generic Letter. Accordingly, also attached is a proposed change to the bases that recognizes the intent of Generic Letter 90-09.

In order to benefit from this revised inspection interval it is requested that the staff approve this request no later than the commencement of the next refueling outage tentatively scheduled for April 13, 1991. To accommodate this review schedule the Supply System has not deviated from the guidance provided by the staff in the generic letter in adapting the recommended changes to the WNP-2 Technical Specifications. Implementation of a 24 month inspection schedule at this time will allow the Supply System to avoid approximately 5 Rem exposure during the 1991 refueling outage and allocate resources that would otherwise be used for snubber inspection to other more significant outage tasks.

We will be submitting separately a request to revise our approved Request for Relief No. ISI-2-007 incorporating these proposed changes in the ISI Program for snubber visual examinations.

Very truly yours,



G. C. Sorensen, Manager  
Regulatory Programs

PLP  
Attachments

cc: JB Martin - NRC RV  
NS Reynolds - Winston & Strawn  
PL Eng - NRC  
DL Williams - BPA/399  
NRC Site Inspector - 901A  
RG Waldo - EFSEC

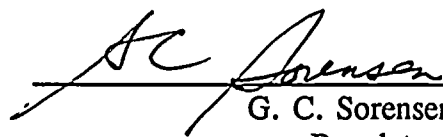
STATE OF WASHINGTON)

COUNTY OF BENTON )

Subject:  
Request for Amendment to  
Technical Specification 3/4.7.4  
(Snubbers) as Recommended by Generic Letter 90-09

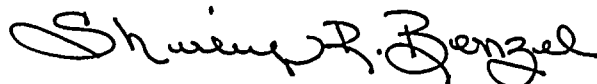
I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information,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

DATE: 18 January, 1991

  
G. C. Sorensen, Manager  
Regulatory Programs

On this date 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 18 day of January 1991.



Notary Public in and for the  
STATE OF WASHINGTON

Residing at Richland, WA.  
My Commission Expires 12/93



1  
2  
3  
4  
5

1  
2  
3  
4  
5

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
31  
32  
33  
34  
35  
36  
37  
38  
39  
40  
41  
42  
43  
44  
45  
46  
47  
48  
49  
50  
51  
52  
53  
54  
55  
56  
57  
58  
59  
60  
61  
62  
63  
64  
65  
66  
67  
68  
69  
70  
71  
72  
73  
74  
75  
76  
77  
78  
79  
80  
81  
82  
83  
84  
85  
86  
87  
88  
89  
90  
91  
92  
93  
94  
95  
96  
97  
98  
99  
100