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SUBJECT: Application for amend to License NFP-21, revising Tech Spec
 3.4.1.2, "Jet Pumps."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

February 25, 1991
G02-91-039

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 3.4.1.2,
JET PUMPS

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 portion of jet pump surveillance 4.4.1.2.1 requiring that the operability demonstration be conducted "at the same flow control valve position" be deleted (see attached). This request is made because the WNP-2 Recirculation System design and the requirements of Technical Specification 3.4.1.3, Recirculation Loop Flow, adequately ensure that the intent of the requirement for "same flow control valve position" is met. Additionally, the potential exists that at certain flow control valve positions during 60 Hz recirculation pump operation, Specification 3.4.1.3 may not be met.

Review of the requirement that the flow control valves be in the same position indicates that the intent of this surveillance is to ensure that the three comparisons in the specification (loop flow vs flow control valve position, total core flow and individual jet pump differential pressure) are measured at approximately balanced jet pump flow each time. These values are compared with baseline values so that system degradation can be identified and the plant placed in a condition for which the Limiting Condition For Operation is not applicable. Degraded jet pump flow could indicate blockage which might affect flow coastdown assumptions made in the accident analysis and jet pump beam failure allowing the jet pump to shift could affect reflood levels assumed in the accident analysis. As a result jet pump operability is required to ensure that assumptions in the accident analysis remain valid and the comparisons are made to detect degraded conditions.

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 3.4.1.2,
JET PUMPS

The design of the Recirculation System at WNP-2 is such that the pumps run at constant speed driven by either 15 Hz or 60 Hz power supplies. As such the only way to vary flow in the recirculation loops is by the flow control valves. WNP-2 operates the recirculation loops to match flows, not flow control valve positions. Experience has shown that both pumps and valves have unique operating characteristics that in combination could potentially cause non-compliance with Specification 3.4.1.3. Accordingly it is operationally more prudent to conduct the surveillance at the same flow rather than at the same flow control valve position. In this manner compliance with Specification 3.4.1.3 is assured. Further, surveillance 4.4.1.2.1.a assures that the relationship between flow and flow control valve position is examined against a baseline for abnormal indications. With the comparison between flow and flow control valve position being made and the fact that pump speed is constant, the requirement for the flow control valves to be the same has no contribution towards meeting the intent of the surveillance.

The combination of constant speed pumps and compliance with the flow mismatch criteria of Specification 3.4.1.3 ensure that similar core conditions are established prior to conducting the surveillance comparisons. As such the intent of the specification is met and there is no need to match flow control valve positions.

The Supply System has evaluated this amendment request per 10 CFR 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 proposed change preserves the intent of the Technical Specification and assures compliance to Technical Specification 3.4.1.3. Because of plant design and the requirements for flow mismatch of Specification 3.4.1.3, the core conditions during which comparisons are made to baseline values will remain within acceptable bounds. Therefore, there is no increase in the probability or consequences of a previously evaluated accident.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change does not implement any changes to the operation of the facility and no new modes of operation of any equipment are introduced. Therefore, no new or different kind of accident is created.
- 3) Involve a significant reduction in a margin of safety. As discussed above, the proposed change preserves the intent of the specification and also assures compliance with Specification 3.4.1.3. Because the change does not allow core conditions to change significantly there is no decrease in the probability that a degraded jet pump condition will remain undetected by the surveillance comparisons. Therefore, there is no significant reduction in a margin of safety.

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 3.4.1.2,
JET PUMPS

As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for a 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 10 CFR 51.22(c)(9) and therefore, per 10 CFR 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 10 CFR 50.91, the State of Washington has been provided a copy of this letter.

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
3.4.1.2, Jet Pumps

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: 25 FEB, 1991

G. C. Sorensen
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 25th day of February 1991.

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

Residing at Richland, WA

My Commission Expires 7/14/91



