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SUBJECT: Application for amend to license NPF-21, requesting battery load profiles utilized to verify operability re Tech Spec surveillance requirements 4.8.2.1.d.2 be relocated to FSAR.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

April 4, 1991
G02-91-064

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 4.8.2.1,
BATTERY LOAD PROFILES

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 battery load profiles of surveillance requirement 4.8.2.1.d.2 be relocated to the Final Safety Analysis Report (FSAR) and the surveillance requirement administratively modified (see attachment 1) to refer to the FSAR for the specific details of the profiles. This request is made in order to facilitate changes in the plant that, because of the process required to obtain approval of changes to the Technical Specification, the potential exists for delays in implementation with no apparent gain in nuclear safety as a result of the process.

Some design enhancements to WNP-2, allowing flexibility to plant operations, have created situations in which the battery load profile(s) had to be updated to accommodate the design. The load profiles as presented in the Technical Specification are not design limits on the battery(s) but are lower load profiles that reflect the true load expected on the battery(s). As a result there is margin available before a battery design limit is approached. Consequently, any change in the load due to the addition of a plant modification, although increasing the load on the battery (yet not encroaching on a design margin) still results in the total load being less than a design limit. Because the load profile is in the Technical Specifications this perturbation to the load profile requires a change request to be submitted to the Staff. The enhancement, being beneficial to plant operation can consequently be delayed in implementation due to the need to process the Technical Specification change. With the proposed revision the design margin is preserved yet plant changes affecting the profile(s) are accommodated without the potential delay discussed above.

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With relocation of the profiles to the FSAR any changes to the plant design that impact the profiles still require the same level of review. All plant safety related design changes receive design safety analyses and fall under the requirements of 10CFR 50.59 and would require just such reviews and, if necessary, staff approval should the change be identified as an unreviewed safety question by the 10CFR 50.59 review process. With relocation of the load profiles, changes receive the same degree of formality, attention and design control as the entire plant. Further, changes beneficial to the plant will not be potentially delayed and the resources necessary to process the change request for both the NRC and plant staff can be preserved for more significant issues.

To implement this change attachment 2 will be incorporated into the WNP-2 FSAR and the following inserted in the FSAR text for each battery:

"Table 8.3-7 is the battery load profile (minimum amperage) based on anticipated breaker operations required during loss-of-offsite power (LOOP) and loss-of-coolant accident (LOCA) conditions utilized to verify operability in accordance with Technical Specification Surveillance Requirement 4.8.2.1.d.2."

In reviewing the background to this revision it should be noted that a similar change, relocation of the battery load profiles, has been proposed in the recently released NUREG 1434 (draft), Standard Technical Specifications General Electric Plants, BWR/6.

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 proposed change preserves the control of the battery(s) design limit and thereby ensures that design changes are not introduced that would exceed design limits. A design change that would impact the battery load would receive a design safety analysis. Part of this assessment would be the consideration of the revised load on the battery capacity. In addition, because plant design changes are always evaluated to the requirements of 10CFR 50.59, the battery(s) will receive the same level of review as the entire plant. Therefore the relocation of the table will not introduce a higher probability of battery(s) failure. The design limits will be preserved. Therefore, there is no increase in the probability or consequences of a previously evaluated accident introduced by this change.
- 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.

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- 3) Involve a significant reduction in a margin of safety. No reduction in a margin of safety is possible as the battery(s) will continue to receive the same treatment as they presently do. Any future changes to the requirements as incorporated in the FSAR will be evaluated per the standards of 10CFR 50.59 which is a more stringent review than the 10CFR 50.92 process. Accordingly design margins will be preserved. Therefore, there is no significant reduction in a margin of safety represented by this change.

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.

At present the Supply System has a change to the battery load profile for battery B1-HPCS to accommodate the change out of the local starter for the HPCS diesel lube oil soak back pump motor to reduce starting current load. The change has received a design safety analyses review and is considered not to be an unreviewed safety question. Accordingly the change could be implemented now. However because of the necessity of processing the Technical Specification change request implementation is delayed. In the interim the pump is being operated continuously. A Technical Specification change request for this situation was considered for submittal but it is more efficient to address relocation of the profiles in total rather than be continuously confronted with the need to formally submit changes that are not considered to be unreviewed safety questions. As stated above, review of NUREG-1434, Standard Technical Specifications General Electric Plants, BWR 6 indicates that the battery load profiles will not be included as part of the Technical Specification Improvement Program. For WNP-2 these profiles have been changed in amendments: 6 dated October 10, 1984; 68 dated June 6, 1989 and 83 dated May 22, 1990. A change addressing only the soak back pump motor starter would relieve the immediate situation but would not resolve the ongoing difficulties of having the profiles in the Technical Specifications. Because continuous operation of the soak back pump imposes an

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unnecessary burden on the plant it is requested that this change request be addressed in a timely manner rather than be deferred as a known change being implemented in the Technical Specification Improvement Program.

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

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STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Request for Amend to TS
Battery Load Profiles

I, A. G. HOSLER, being duly sworn, subscribe to and say that I am the Manager, WNP-2 Licensing, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the 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 April 7, 1991

A. G. Hosler
A. G. Hosler, Manager
WNP-2 Licensing

On this date personally appeared before me A. G. HOSLER, 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 7th day of April 1991.

Bernice Kado
Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994



