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 SORESENSEN, G.C. Washington Public Power Supply System
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SUBJECT: Application for amend to License NPF-21, changing Tech Spec
 Table 3.3.6-1.4.a, "Control Rod Block Intermediate-Range
 Monitor Not Full in Signal" to delete footnote which states
 that signal bypassed when detectors in Range 1.

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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 TS TABLE 3.3.6-1.4.a CONTROL
ROD BLOCK INTERMEDIATE RANGE MONITOR NOT FULL IN SIGNAL

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, this proposal requests that footnote "(e)" applicability to item 4.a of the subject table be deleted as it incorrectly states that the detector not full in signal is "bypassed" when the detectors are in range 1. (see attached).

The Intermediate Range Monitor System (IRM) provides neutron flux (power) level indication during reactor startup and plant heatup and provides reactor trip or control rod block signals if the IRM system detects abnormal flux conditions, malfunctions, or is not positioned correctly in the core. The IRM detectors are mechanically inserted and withdrawn from the core depending on plant conditions. During startup and plant heatup the monitors are fully inserted. During power operation the monitors are withdrawn from the core when the range of the IRM instrument is exceeded. Prior to withdrawal, overlap between the IRM and the Average Power Range Monitoring System (APRM) is confirmed and the APRM system power indication and trip signals are relied on after the IRMs are withdrawn. Further, withdrawal of the IRMs from the core prolongs the life of the monitors as they are not exposed to the higher neutron flux levels associated with continuous power operation.

During conditions when the IRMs are required, if they were not in the "full in" position the indicated power signal and any trip or rod block signals could be nonconservative. For this reason a "detector not full in" rod block signal is provided to assure that rods cannot be withdrawn from the core when the detectors are not positioned correctly.

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