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 SORESEN, G.C. Washington Public Power Supply System
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SUBJECT: Application for amend to License NPF-21, revising TSs
 3.4.3.1, 3.4.3.2, 4.4.3.2.1.b, B 3/4.4.3.1 & B 3/4.4.3.2, per
 Generic Ltr 88-01 re NRC position on IGSCC in austenitic
 stainless steel piping.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 10, 1992
G02-92-085

Docket No. 50-397

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

Gentlemen:

Subject: WNP-2, OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 88-01

- References:
- 1) Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping"
 - 2) Letter, G02-89-123, GC Sorensen (SS) to NRC, "Supply System Response to Generic Letter 88-01, Request for Additional Information", dated July 20, 1989
 - 3) Letter, G02-88-164, GC Sorensen (SS) to NRC, "Response to Generic Letter 88-01", dated July 26, 1988
 - 4) Letter, PL Eng (NRC) to GC Sorensen (SS), "Response to GL 88-01, Intergranular Stress Corrosion In Piping (TAC No. 69161)", dated December 28, 1990
 - 5) Letter, G02-92-004, GC Sorensen (SS) to NRC, "Response to NRC SER on Generic Letter 88-01 (TAC No. 69161)", dated January 8, 1992
 - 6) Generic Letter 88-01, Supplement 1, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping"

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. Generic Letter 88-01 provides the Staff position concerning implementation of an Inservice Inspection (ISI) Program for austenitic stainless steel piping susceptible to intergranular stress corrosion cracking (IGSCC). Supplement 1 to the Generic Letter, issued February 4, 1992, provided some relief concerning leak detection instrumentation and surveillances. This

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 88-01

letter serves to request those changes to the Technical Specifications to assure the sections related to leak detection are in conformance with the Staff position. As discussed in Reference 5, the Supply System will address changes to the Technical Specifications concerning the ISI Program requirements after the refueling outage scheduled for the Spring of 1992. Changes to the following Technical Specifications are being requested:

- 3.4.3.1 Leakage Detection Systems, ACTION Statement
- 3.4.3.2 Operational Leakage, LCO and ACTION Statement
- 4.4.3.2.1.b Operational Leakage, Surveillance Requirements
- B 3/4.4.3.1 Leakage Detection Systems
- B 3/4.4.3.2 Operational Leakage

The changes to the ACTION Statement and Bases for Leakage Detection Systems assure the capability to quantitatively measure UNIDENTIFIED LEAKAGE is maintained as required by Generic Letter 88-01 and its Supplement 1. This includes the addition of a shutdown requirement in the event that containment sump monitoring instrumentation is inoperable for more than 30 days. The changes to the LCO, ACTION Statement, Surveillance Requirement and the Bases for Operational Leakage, assure that the UNIDENTIFIED LEAKAGE limits are in accordance with those in GL 88-01 or NRC approved alternative measures. The LCO has been changed to limit UNIDENTIFIED LEAKAGE to 2 gpm increase within 24 hours rather than a 2 gpm increase in 4 hours. The Surveillance Requirement for monitoring the primary containment sump flow rate has been changed to require the measurement at least once per shift, not to exceed 12 hours, rather than once per 12 hours.

The Supply System has reviewed the changes per 10 CFR 50.92 and provides the following in support of a finding for no significant hazards consideration. These changes are being made in accordance with the generic letter issued by the NRC and represent additional restrictions on the operation of WNP-2.

- 1) The change to the operational leakage program does not involve a significant increase in the probability of an accident previously evaluated because leakage monitoring is not assumed as the initiator of any analyzed event. In addition, the change does not involve a significant increase in the consequences of an accident as the additional shutdown requirement and the increased surveillance requirements for leak detection may facilitate earlier detection of a failure associated with IGSCC.
- 2) The changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes do not introduce any new mode of plant operation or require any physical modification to the plant.

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 88-01

- 3) There is no reduction in a margin of safety due to these changes because the additional shutdown requirement and the additional surveillances have been established to assure the earliest possible detection of problems with or the need of repair or replacement of piping that may be susceptible to failure due to IGSCC. These changes clearly enhance safety and increase margins, by the implementation of the more restrictive LCO, ACTIONS and Surveillance Requirements.

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. 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 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 10CFR 50.91, the State of Washington has been provided a copy of this letter.

Sincerely,



G. C. Sorensen, Manager
Regulatory Programs (Mail Drop 280)

MGE/bk
Attachments

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

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Request for Amend to Tech. Specs.
In Accordance with GL 88-01

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 10, 1992

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 10th day of April 1992.

Brian Kook
Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994



