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 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 3/4.4.6
 re pressure/temp limits, in ref to Generic Ltr 91-01,
 "Removal of Schedule for Withdrawal of Reactor Vessel Matl
 Specimens from TSs."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 10, 1992
G02-92-087

Docket No. 50-397

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

Subject: WNP-2, OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
3/4.4.6 PRESSURE/TEMPERATURE LIMITS

Reference: Generic Letter, 91-01, "Removal of the Schedule for the Withdrawal of Reactor Vessel Material Specimens from the Technical Specifications", dated January 4, 1991

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. This proposal requests that the schedule for the withdrawal of reactor vessel material specimens be removed from Technical Specification 3/4.4.6 as suggested by the referenced letter.

As required by Appendix H to 10 CFR Part 50, specimens of reactor vessel material are installed near the inside reactor vessel wall and are withdrawn on a schedule to provide data as to the effect of radiation and thermal environment on the vessel material. Using this data the pressure/temperature limits curve (Technical Specification Figure 3.4.6.1) is adjusted, as necessary, to compensate for the shift in material transition temperature as indicated by tests of the withdrawn specimens. The withdrawal and analysis of the specimens and resulting revision of the pressure/temperature limits curve compose the program necessary to ensure that WNP-2 is operated with confidence in the ductility region of the vessel material. Exposure to a potential for brittle fracture is then precluded.

Section II.B.3 of Appendix H to 10 CFR Part 50 requires the submittal to, and approval by, the NRC of a specimen withdrawal schedule prior to program implementation. WNP-2 Final Safety Analysis Report Section 5.3.1.6.1 describes the withdrawal schedule which was approved by the NRC in NUREG-0892, the WNP-2 Safety Evaluation Report. As noted in the reference, having the withdrawal schedule in the Technical Specifications duplicates the controls established by Appendix H. Hence, deletion of the schedule, as suggested, is appropriate and does not decrease the clarity of the requirement or represent a loss of regulatory control. Accordingly, this letter follows the guidance of the reference and requests removal of the schedule.

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The attached Technical Specification pages indicate the changes as suggested by the enclosure to the reference. Table 4.4.6.1.3.1, "Reactor Vessel Material Surveillance Program Withdrawal Schedule" has been deleted, Surveillance Requirement 4.4.6.1.3 has been modified to delete reference to the removed table and the "List of Tables", page xxiv, also shows deletion of the table. As recommended by the reference the requirement to update the pressure/temperature curves as a result of the specimen examination has been retained in Surveillance Requirement 4.4.6.1.3. The reference also required a commitment to include the withdrawal schedule in the next revision of the safety analysis report and commit to maintaining it in the safety analysis report. As noted above, the schedule is in the WNP-2 FSAR. Further, it will be updated, to reflect the details of the removed schedule, in the next revision of the FSAR and retained in the FSAR as part of the Appendix H compliance description.

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 because the regulatory requirement of 10 CFR 50 Appendix H will remain in effect in the Technical Specifications. Removing Table 4.4.6.1.3-1, and any references to it, will not result in any loss of regulatory control because changes to this schedule are controlled by the requirements of 10 CFR 50 Appendix H. Therefore, this change does not involve a significant 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 as previously stated in Appendix H Section II.B.3 of 10 CFR 50, the licensee must have a withdrawal schedule approved by the NRC prior to program implementation. Removal of Table 4.4.6.1.3-1 and any references to it only eliminates duplication of a requirement that is already adhered to by compliance to 10 CFR 50 Appendix H. No new modes of operation of any equipment result due to this change. Therefore 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 because the surveillance requirement still requires surveillance specimens to be removed and examined, to determine changes in material properties, at intervals required by 10 CFR 50 Appendix H. Further, no change is made in the requirement that the results of these examinations shall be used to update the pressure/temperature curves of Technical Specification Figure 3.4.6.1. Therefore, this change does not involve a significant reduction in a margin of safety.

Page Three

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
3/4.4.6, PRESSURE/TEMPERATURE LIMITS

As discussed above, the Supply System considers that these changes do 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 do they involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet 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 these changes is not required.

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

Sincerely,



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

PLP/bk
Attachments

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

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Request for Amend to Tech. Specs.
3/4.4.6 Pressure/Temperature Limits

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.

Bonnie Koko
Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994



