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SUBJECT: Application for amend to License NPF-21,revising TS 3/4.4.6 to relocate fluence-dependent pressure/temp limits to Pressure/Temp Limits Rept,in ref to Generic Ltr 88-16, "Removal of Cycled-Specific Parameter Limits from TSs."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Docket No. 50-397

April 10, 1992
G02-92-088

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, 88-16, "Removal of Cycle-Specific Parameter Limits from Technical Specifications", dated October 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 fluence-dependent pressure/temperature limits of Technical Specification 3/4.4.6 be relocated to a Pressure/Temperature Limits Report. The Pressure/Temperature Limits Report would contain the fluence-dependent parameters (calculated in accordance with NRR approved methodology) and would be referenced by the Technical Specifications to ensure that the plant is operated within design specifications. In support of this request, proposed changes to the Bases and administrative section of the Technical Specifications are also included.

As required by Appendix G to 10 CFR Part 50, operating pressure and temperature limits are calculated and adhered to by plant operations to ensure fracture toughness requirements of the reactor pressure boundary are maintained. NRC approved methodology is used to derive the specific parameters of the curves. Further, in accordance with 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H to 10 CFR Part 50, specimens of reactor vessel material are installed near the inside reactor vessel wall and are withdrawn on a schedule to provide data as to the effect of radiation fluence and thermal environment on the vessel material. Using this data the pressure/temperature limits are adjusted, as necessary, to compensate for the shift in material transition temperature as indicated by tests on the withdrawn specimens.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 thus precluded. Because the curves generally change with reactor vessel fluence, retaining the curves in the Technical Specifications causes the Technical Specification amendment process to be exercised. The parameters are derived using an NRC approved methodology and could be verified by the Staff without amending the license. With the curves in the Technical Specifications the license amendment process imposes an unnecessary burden on both the licensee and the NRC staff.

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As stated in the proposed insert to the administrative section of the Technical Specifications the Pressure/Temperature Limits Report parameters will be verified after each capsule withdrawal period and a report provided to the NRC. Hence, proper application of the NRC-approved methodology can be confirmed by the Staff. Further, the Pressure/Temperature Limits Report will be referenced in the Technical Specifications so that the same degree of control on plant operation will be maintained. As a result, this proposed change provides the same assurance of compliance to design specifications yet removes an unnecessary burden on both plant and NRC Staff. The relocation of the fluence-dependent variables is responsive to industry and NRC efforts on improvements in Technical Specifications and follows the intent of the referenced Generic Letter.

Attachment 1 provides changed pages to the WNP-2 Technical Specifications as required by this request and Attachment 2 provides an example of the proposed WNP-2 Pressure/Temperature Limits Report.

The Supply System has evaluated this amendment request per 10CFR 50.92 and determined that it does not represent a significant hazard. The removal of the fluence-dependent variables from the Technical Specifications has no impact on plant operation or safety. The Technical Specification will continue to require operation within the pressure/temperature limits for each reactor vessel fluence period as calculated in accordance with NRC approved methodology. Appropriate actions to be taken if limits are exceeded will also remain in the Technical Specifications. In conclusion, this change 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 relocation of the pressure/temperature curves has no impact on the probability or consequences of a previously evaluated accident.

   The fluence specific pressure/temperature limits will be relocated to a Pressure/Temperature Limits Report. The requirements to operate within the limits will continue to be maintained in the Technical Specifications.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated because as previously stated operation will continue to be maintained within design limits determined using approved methodology. Hence, 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 margin of safety presently provided by the current Technical Specifications remains unchanged. The limits are derived using approved methodology and compliance to the limits remains in the Technical specifications. Therefore, this change does not involve a reduction in a margin of safety.

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
WM Dean - NRC
NS Reynolds - Winston & Strawn
NRC Site Inspector - 901A
DL Williams - BPA/399

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Request for Amend to Tech. Specs. 3/4.4.6, PTLR

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.

Bernice Cook

Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994