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 SORENSEN,G.C. Washington Public Power Supply System
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SUBJECT: Suppls 910221 & 1015 applications for amend to License
 NPF-21,changing TS 3/4.3.5 & Tables 3.3.5-1 & 4.3.5.1-1 re
 RCIC actuation instrumentation,per discussions w/NRC.BWR
 Owners Group clarification of ECCS instrumentation encl.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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July 28, 1992
G02-92-177

Docket No. 50-397

U.S. Nuclear Regulatory Commission
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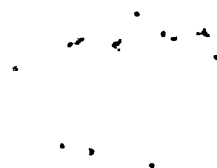
Gentlemen:

Subject: WNP-2, OPERATING LICENSE NPF-21,
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 3/4.3.5 AND
TABLES 3.3.5-1 & 4.3.5.1-1 RCIC ACTUATION INSTRUMENTATION
AND SURVEILLANCE REQUIREMENTS, SUPPLEMENTARY INFORMATION

- References: 1) Letter G02-91-188, dated October 15, 1991, GC Sorensen (SS) to NRC, same subject
- 2) Letter G02-91-035, dated February 21, 1991, GC Sorensen (SS) to NRC, "Request for Amendment to TS 3/4.3.3 and Tables 3.3.3-1, 4.3.3.1-1, 3.3.5-1 & 4.3.5.1-1 ECCS & RCIC Actuation Instrumentation and Surveillance Requirements"
- 3) Letter OG7-277-12, dated April 20, 1987, L. Rash (GE) to BWR Owners Group Technical Specification Improvement Committee Members for Cleveland Electric Illuminating Company and Washington Public Power Supply System, "Plant Specific Technical Improvement (TSI) Analysis for the Emergency Core Cooling System (ECCS)"
- 4) Letter OG92-584-32D, dated July 9, 1992, JD Friday/WP Sullivan (GE) to BWR Owners Group Technical Specification Committee - D, "Clarification to Plant Specific Technical Specification (TSI) Analyses for Emergency Core Cooling System (ECCS) Actuation Instrumentation" (attached)

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 3/4.3.5 AND
TABLES 3.3.5-1 & 4.3.5.1-1 RCIC ACTUATION INSTRUMENTATION
AND SURVEILLANCE REQUIREMENTS, SUPPLEMENTARY INFORMATION

Reference 1 requested technical specification changes to RCIC actuation instrumentation and surveillance requirements based on General Electric analysis utilized by both References 1 and 2. Reference 2 requested similar changes to the ECCS instrumentation. Reference 3 was submitted as an attachment to Reference 2 and provided justification for plant specific changes to both RCIC and ECCS instrumentation surveillance requirements and allowed outage times. The methodology used by Reference 3 was based on a previously approved generic analysis and an explanation of the impact of design differences between the generic model and the specific plant. In discussions with Mr. H. Garg of your staff it was recognized that two explanations of differences and impact had not been provided by GE in Reference 3. These dealt with RCIC instrumentation differences with respect to High Drywell Pressure and High Suppression Pool Water Level. Reference 4 (attached) addresses these differences and concludes that the generic analyses remain applicable to WNP-2. The Supply System concurs with this conclusion and the explanation of impact provided in the attached.

This supplementary information does not impact the intent of the original request nor does it affect the conclusions of Reference 1. The determination that the requested change does not represent a significant hazard remains valid as does the conclusion that the change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and does not require an environmental assessment.

Sincerely,



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

PLP/bk
Attachment

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

To: <i>Mr. Powell</i>	From: <i>Bill Switzer</i>
Co.	GE Nuclear Energy
Dept.	Phone # <i>(408) 925-6944</i>
Fax # <i>(408) 377-4317</i>	Fax #

GE Nuclear Energy

OG92-584-32D :
July 9, 1992

To: BWR Owners' Group Technical Specification Committee - D

SUBJECT: Clarification to Plant-Specific Technical Specification
Improvement (TSI) Analyses for Emergency Core Cooling System
(ECCS) Actuation Instrumentation

During a recent review of the Washington Nuclear Unit 2 ECCS Technical Specification Improvement analysis, a question was brought up concerning the disposition of two identified plant-specific differences in the Reactor Core Isolation Cooling (RCIC) system instrumentation. The disposition of these two identified differences in the original analysis was "no affect". However, the disposition of these two items was not documented in the Washington Nuclear Unit 2 ECCS TSI analysis report. A review of other BWR plant-specific analyses having RCIC instrumentation similar to Washington Nuclear Unit 2 indicates that the disposition was also not included in these reports. The purpose of this letter is to provide the disposition of these two RCIC instrumentation differences. The differences are considered minor enough that a revision to the original plant-specific reports is not required.

RCIC Instrumentation Differences (refer to Section II.C. Instrumentation Dependencies, of Plant-Specific Report)

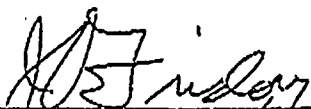
1) High Drywell Pressure

High drywell pressure concurrent with low steam line pressure provides an isolation signal to two normally open motor-operated valves in the vacuum breaker line connected to the RCIC exhaust line to the suppression pool. The valve closure trip is provided for protection of the RCIC turbine exhaust system against operation at high pressures. Failure of the high drywell pressure signal does not significantly affect the RCIC unavailability and overall water injection failure frequency. Therefore, the generic analysis is applicable.

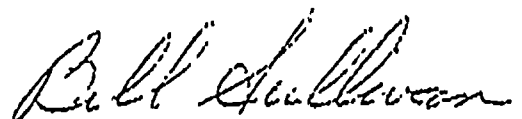
2) High Suppression Pool Water Level

For some plants, a high suppression pool water level signal will switch RCIC suction from the condensate storage tank to the suppression pool. The transfer ensures that suppression pool loads due to excess water are not exceeded. For some plants, such as Washington Nuclear Unit 2, manual action is relied on to switch the RCIC to the suppression pool water source. The water injection failure frequency for this case is improved since the potential for false automatic switching of the RCIC suction is reduced. Therefore, the generic analysis is applicable.

If you have any questions concerning the above please contact either Bill Sullivan (408) 925-6992 or Joel Friday (408) 925-5794.



Joel Friday, Program Manager
BWROG Tech Spec Committee



W. P. Sullivan, Principal Engineer
Reliability Engineering Services

cc: C. L. Tully, BWROG Chairperson
L. A. England, BWROG Vice Chairman
BWROG Primary Representatives of Participating Utilities
S. J. Stark, GE

