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 AUTH: NAME AUTHOR AFFILIATION
 SORENSEN, G. C. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
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SUBJECT: Application for amend to License NPF-21, changing TS
 3/4.3.7.6 re source range monitor surveillance criteria
 specified in LCD to incorporate guidance in Rev 1 of GE svc
 info ltr covering channel rate count.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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September 2, 1992
G02-92-208

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 SPECIFICATION
3/4.3.7.6 SOURCE RANGE MONITORS

- Reference: 1) General Electric Service Information Letter No. 478, "SRM Minimum Count Rate," dated December 16, 1988
- 2) Letter G02-92-016, dated January 21, 1992, GC Sorensen (SS) to NRC, "Request for Amendment to TS Limiting Condition for Operability 3/4.9.2 Source Range Monitor Operability, Refueling Operations"
- 3) Letter, dated April 10, 1992, WM Dean (NRC) to GC Sorensen (SS), "Issuance of Amendment for the Washington Public Power Supply System Nuclear Project No. 2 (TAC No. M82662)"

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 source range monitor (SRM) surveillance criteria specified in the subject Limiting Condition for Operation be changed (as attached) to incorporate the Reference 1 Service Information Letter (SIL) guidance. The SIL guidance modifies the acceptable SRM channel count rate and signal-to-noise ratio values to maintain the General Electric design confidence level.

This same change was requested in Reference 2. However because the primary purpose of Reference 2 was to request changes in the Refueling Instrumentation Technical Specification SRM requirements to allow a complete core offload the applicability of the SIL guidance to Specification 3/4.3.7.6 was not recognized.

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REQUEST FOR AMEND. TO TS LCO 3/4.3.7.6
SOURCE RANGE MONITORS

The SRMs provide the operator with information relative to the neutron level at very low flux levels. As such, the SRM indication is used to determine the approach to criticality and when criticality is achieved. The SRMs provide monitoring of reactivity changes during fuel or control rod movement and give the control room operator early indication of unexpected subcritical multiplication that could be indicative of an approach to criticality. Although no credit is taken for SRM function in any WNP-2 design basis accident or transient analysis they do provide indication to the operator that aids in reactor control.

The Reference 1 SIL provides guidance to modify the SRM count rate to ensure that the design 95% confidence level is maintained in verifying SRM operability. As stated in the SIL, the acceptable SRM count rate value based on signal-to-noise (S/N) ratio has not been consistent within the BWR community. As a result of inquiries from some BWRs, General Electric conducted studies showing that a 95% confidence level can be preserved by specifying either 0.7 counts per second (cps) with a $S/N \geq 20$ or 3 cps with a $S/N \geq 2$. As stated above, Reference 2 requested this change for Technical Specification 3/4.9.2 (Refueling Operations). Reference 3 issued the change for implementation at WNP-2. The change is also appropriate for Specification 3/4.3.7.6.

The Supply System has evaluated this change request per 10 CFR 50.92 and determined that it does not represent a significant hazards consideration because it does not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The SRM instrumentation is not assumed to be an initiator of any analyzed event. The SRM instrumentation provides monitoring of neutron flux levels to give the control room operator early indication of unexpected subcritical multiplication that could be indicative of an approach to criticality. As such, action could be taken on the indication to avert or minimize the consequences of the event. However, the SRM function is not relied upon in any design bases or transient analysis. Rod motion interlocks and other instrumentation are relied on in the accident analysis to avert an accident. The change in acceptable count rate and signal-to-noise ratio preserves the confidence level of the General Electric design. As a result, the consequences of any analyzed events are unaffected because the change does not alter any system or component design assumptions or operation. Therefore, no significant increase in the probability or consequences of an accident previously evaluated will be involved.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed change in SRM count rate and S/N ratio values does not create the possibility of a new or different kind of accident from any previously evaluated because it does not change modes of plant operation or require physical modifications. The change preserves the original General Electric design confidence level. No new or different kind of accident is therefore credible.

REQUEST FOR AMEND. TO TS LCO 3/4.3.7.6
SOURCE RANGE MONITORS

- 3) Involve a significant reduction in a margin of safety. The change in SRM count rate and S/N ratio values does not affect a margin of safety because the values preserve the original General Electric design confidence level. Therefore, no margin of safety is impacted by this change.

As discussed above, the Supply System concludes 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, nor does the change involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets 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 and the Supply System Corporate Nuclear Safety Review Board. In accordance with 10 CFR 50.91, the State of Washington has been provided a copy of this letter.

Very truly yours,



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

PLP/bk
Attachments

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



STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Request for Amend to TS
Source Range Monitors

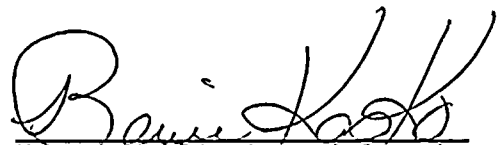
I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE 2 SEPT, 1992


G. C. Sorensen, Manager
Regulatory Programs

On this date personally appeared before me G. C. SORENSEN, 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 2 day of September 1992.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994

