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SUBJECT: Application for amend to License NPF-21, changing TS Figure
 3.1.5-2 re sodium pentaborate tank, vol vs concentration
 requirements to reflect actual low vol alarm & low limit
 values for standby liquid control tank.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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September 2, 1992
G02-92-210

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 FIGURE 3.1.5-2
SODIUM PENTABORATE TANK, VOLUME VS CONCENTRATION REQUIREMENTS

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. Specifically, this proposal requests that the subject figure be revised (as attached) to reflect the actual low volume alarm and low limit values for the Standby Liquid Control (SLC) tank. The present figure indicates a low level alarm at 4587 gallons which is also the low limit for the tank volume. An alarm at the low limit is not prudent design, as receiving an alarm at that level would not allow for corrective actions before violating the Technical Specifications. The actual low level alarm is at 4682 gallons which provides adequate margin to take corrective action before exceeding the low level limit of 4587 gallons.

The SLC system is designed to provide shutdown capability without control rod movement. The SLC system consists of the sodium pentaborate solution storage tank, two pumps, piping and valves to transfer borated water from the tank to the reactor pressure vessel. Figure 3.1.5-2 provides the limits of solution and volume necessary to ensure that the SLC system is capable of fulfilling the system design function. Further, 10 CFR 50.62 specifies that for Anticipated Transient Without Scram (ATWS) mitigation the SLC system shall have the capability in flowrate, B^{10} enrichment, and boron concentration such that, when accounting for reactor pressure vessel volume, an equivalent injection rate of 86 gallons per minute of 13 weight percent sodium pentaborate decahydrate solution at the natural B^{10} enrichment can be attained. Operation within the limits of figure 3.1.5-2 ensures compliance with these requirements.

Figure 3.1.5-2 was revised in Amendment 43 to the Technical Specifications, as requested by the Supply System, in response to the ATWS rule. An oversight was made in that the Amendment 43 request did not identify that the low level alarm in the figure should have been noted as the low level limit and the low level alarm should have been denoted at 4682 gallons. The attached figure corrects this discrepancy.

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION FIGURE 3.1.5-2
SODIUM PENTABORATE TANK, VOLUME VS CONCENTRATION REQUIREMENTS

The Supply System has evaluated this amendment 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 because the change corrects the Technical Specifications to reflect the correct and more conservative operating capability of the design. In this instance there is no increase in the probability or consequences of an accident previously evaluated because no changes in concentration limits or volume are proposed by this change. The Technical Specifications are being changed to recognize the more prudent operating mode of the SLC storage tank in that margin is available, and has always been available, after a low level alarm. The margin allows corrective action to be taken prior to exceeding Technical Specification limits. In summary, a more prudent mode of operating is recognized by this change and the design requirements of volume and concentration are not changed. Hence, the accident analyses remains unaffected by this change.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the SLC function and reliability are not affected by this change. No new modes of plant operation are introduced with this change. Hence, no new or different kind of accident is credible.
- 3) Involve a significant reduction in a margin of safety because as stated above, no change to the required volume and concentrations are being proposed by this change. Neither the original design or accident analysis is affected by this change. A more prudent mode of operation, that currently exists, is recognized by this proposal. Therefore, there is no impact to a margin of safety with this change.

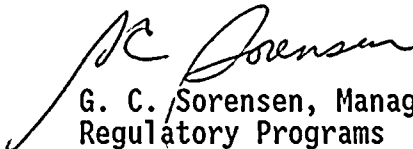
As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does it involve a significant increase 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 the change is not required.

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION FIGURE 3.1.5-2
SODIUM PENTABORATE TANK, VOLUME VS CONCENTRATION REQUIREMENTS

This Technical Specification change 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

PLP/bk
Attachments

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

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Request for Amend to TS - SLC

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
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.

Bonnie Kaye
Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994

10/16/92
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