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 AUTH.NAME AUTHOR AFFILIATION  
 BAKER,J.W. Washington Public Power Supply System  
 RECIP.NAME RECIPIENT AFFILIATION  
 MARTIN,J.B. Region 5 (Post 820201)

SUBJECT: Requests waiver of compliance from TS 3.8.1.1 re ac sources  
 operating as result of action statement entered on 921130  
 when Div 2 EDG declared inoperable due to failure to achieve  
 required voltage within TS specified time.

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## WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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December 2, 1992  
G02-92-261

Docket No. 50-397

Mr. J. B. Martin  
Regional Administrator  
U.S. Nuclear Regulatory Commission  
Region V  
1450 Maria Lane, Suite 210  
Walnut Creek, CA 94596

Dear Mr. Martin:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
REQUEST FOR WAIVER OF COMPLIANCE FOR TECHNICAL  
SPECIFICATION  
3.8.1.1, AC SOURCES OPERATING**

The Supply System is requesting a waiver of compliance from the portion of Action Statement A of Technical Specification 3.8.1.1, AC Sources - Operating, that requires that HOT SHUTDOWN conditions be established if an inoperable diesel generator cannot be restored to OPERABLE status within 72 hours. This Action Statement also requires that several surveillances be performed to establish the operability of other AC sources. As discussed below this portion of the action statement has been and will continue to be met. The waiver is being sought only for that portion that requires that if operability of the DG cannot be restored within 72 hours then the plant be in at least hot shutdown within the next 12 hours. The action statement was entered on November 30, 1992, at 1:37 am, for the reasons discussed below. The Supply System is requesting that the 72 hours action statement be extended by 48 hours (to 120 hours total) to allow for the replacement of a suspect failed voltage regulator module and the necessary post maintenance testing on the repaired DG.

Description of Condition

On November 30, 1992, at 1:37 am, the Division 2 emergency diesel generator was declared inoperable due to a failure to achieve the required voltage within the time specified in the Technical Specification Surveillance. Test data revealed that the generator field was flashed and voltage build up occurred normally to approximately 80% voltage. At 80% voltage, the voltage discontinued increasing substantially for about six to eight seconds, then once again increased at a normal rate to nominal voltage. Overall time for the voltage to get to 94% rated voltage (breaker closure permissive) was about 13 seconds.

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In subsequent trouble shooting, three fast starts showed the voltage regulator to function normally meeting the 10 second requirement.

In discussions with the voltage regulator vendor, it was noted that they had had similar problems caused by the adjustment of the voltage regulator. The voltage regulator module was found to be out of adjustment. The decision was made to replace the voltage regulator control module. All other apparent causes for a failure to achieve required voltage were eliminated.

The replacement voltage regulator module has subsequently been evaluated as suspect causing another voltage regulator module to be located. Installation of this voltage regulator module is now in progress. Because of the extended time to remove and install the voltage regulator module, and the fact that the initial replacement was unsuccessful, it is apparent that the remainder of the 72 hour allowed outage time will elapse before the second voltage regulator module can be installed and adequately tested.

The Supply System believes the best course of action would be to continue plant operation until the operability of the DG is restored rather than to subject the plant to a forced shutdown. Prompt action is appropriate because failure to act in a timely manner will impose an unnecessary plant shutdown for a condition that involves minimal safety reduction and, as discussed below, does not involve a significant hazards consideration. The need to request the waiver on an emergency basis could not have been reasonably avoided because the problem occurred during recent surveillance testing, and subsequently, the 72-hour LCO was entered.

Plant Status and Compensatory Actions

The Supply System is in full compliance with the remainder of the Action Statements required in the event of an inoperable DG. All offsite sources are operable and the required surveillances and verifications of other components and systems are being performed as required. Crews are working continuously, with direct management involvement, to restore DG 2. The second voltage regulator module is in the process of being installed and will subsequently be acceptance tested before a declaration of operability can be made. Additional compensatory measures have been taken and will be continued until the completion of testing, should the waiver be granted. Maintenance activities and surveillances on Engineered Safety Features, in particular the plant AC electrical systems, will be carefully controlled so as to reduce the risk or consequences of any plant centered loss of offsite power. There are controls in place on maintenance activities in the Ashe, Benton, and plant switchyards, to further reduce the possibility of a loss of offsite power. We have communicated with the Bonneville Power Administration (BPA) and have been assured that the reliability of the grid, at this time, is very high. The BPA has no scheduled maintenance activities on the grid (through December 5, 1992) that would affect offsite power supplies to WNP-2. The BPA has further confirmed that there are no electrical or winter storms predicted that represent a threat to the stability of the offsite grid. There are no unusual loading conditions, breakers out-of-service, abnormal bus tie or substation tie configurations.



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The BPA has been informed of a need to control any maintenance activities on those portions of the 500, 230, and 115 KV systems that might result in high risk for disturbances on these lines or a loss of the 230 or 115 KV supply lines to WNP-2. Additionally the BPA has agreed that in the event of emergency maintenance activities that may have to be performed during this interval they will coordinate those activities with the WNP-2 control room. These controls will remain in effect until the action statement is exited. All maintenance and testing will be done in accordance with an approved Maintenance Work Request or procedure. A portable power supply has been staged near DG 2 with portable lights so that restoration activities may continue without interruption in the event of a loss of offsite power.

The Supply System will be involved during the analysis of the suspect voltage regulator module. If it is determined, at any time, that this failure represents the potential for a common mode failure, the operability of the remaining two DGs will be evaluated.

Justification of the Duration of the Waiver

Upon completion of the voltage regulator module installation post maintenance testing will begin. This testing will be followed immediately by the required Technical Specification surveillance tests. Although the projected time for the replacement and maintenance testing was originally expected to be complete during swing shift, December 2, 1992, the Supply System is requesting the additional time in order to allow for resolution of any further problems that may be encountered. The Supply System believes that the additional 48 hours will support the completion of the activities and avoid unnecessary plant shutdown. If, however, it is determined that the voltage regulator module cannot be successfully adjusted, WNP-2 will be shut down. If additional problems are identified during the maintenance or testing activities that will prevent the restoration of DG 2 within the allotted time, the plant will be shutdown, so that the problem can be resolved. Upon restoration of DG operability, the Action Statement will be exited, regardless of remaining available time.

Safety Significance

The proposed request is not a significant safety concern because the Division 1 and Division 3 DGs are operable and high grid reliability is being maintained. As discussed below in the No Significant Hazards discussion, the core damage frequency is only slightly increased should DG 2 be unavailable.

No Significant Hazards Consideration

The Supply System concludes that the extension of the specified Action Statement completion time does not involve a significant hazards consideration for the following reasons:

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It would not involve a significant increase in the probability or consequence of an accident. The unavailability of an onsite source can not impact the probability of the loss of offsite power or the other emergency diesels. The IPE/PRA WNP-2 model was evaluated with DG 2 unavailable. The Core Damage Frequency (CDF) increased 4.0% from  $5.42\text{E-}05/\text{yr}$  to  $5.63\text{E-}05/\text{yr}$ . Thus the consequences of a loss of offsite power are not significantly increased.

It would not create the possibility of a new or different kind of accident. The actions being taken are to restore the DG 2 to an operable condition. No change in the design or operation of the equipment is being proposed. With DG 2 unavailable, the significant accident considerations involve the loss of onsite or offsite power. Both of these are previously evaluated events.

It would not create a significant decrease in a margin of safety. As written, the Technical Specifications allow the DG to be inoperable for a 72-hour period provided certain compensatory actions are taken. The actions will remain in place for the additional 48 hours requested, along with measures taken by BPA.


Environmental Considerations

The issuance of the requested waiver would have no environmental consequences because of the high reliability of the plant onsite and offsite power supplies.

Summary and Conclusions

WNP-2 is currently in a 72-hour LCO on the Division 2 DG due to the suspected failure and subsequent replacement and testing of the voltage regulator module. A waiver of compliance is being requested to allow the extension of this time limit. This request has been approved by the WNP-2 Plant Operations Committee. It is requested that the waiver be granted from 1:37 am, Thursday December 3 to 1:37 am, Saturday, December 5, 1992. Absent approval of the request, WNP-2 will be required to commence a plant shutdown no later than 1:37 am, December 3, 1992. All other Technical Specification requirements will remain in effect.

Sincerely,



J. W. Baker

WNP-2 Plant Manager (Mail Drop 927M)

cc: Document Control Desk  
JW Clifford - NRC  
DL Williams - BPA/399  
NRC Site Inspector - 901A