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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 covering
implementation of ISI program for austenitic stainless
steel piping,per GL 88-01.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

April 1, 1993
G02-93-076

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 SPECIFICATIONS
IN ACCORDANCE WITH GENERIC LETTER 88-01**

- References:
- 1) Generic Letter 88-01, "NRC Position on IGSCC in BWR Austenitic Stainless Steel Piping"
 - 2) Letter G02-92-241, dated October 16, 1992, GC Sorensen (SS) to NRC, "Response to Generic Letter 88-01"
 - 3) Letter, dated January 19, 1993, JW Clifford (NRC) to GC Sorensen (SS) "Alternate Schedule for IGSCC Inspections (TAC No. M84714)"
 - 4) Letter, PL Eng (NRC to GC Sorensen (SS), dated December 28, 1990, "Response to GL 88-01, Intergranular Stress Corrosion in Piping (TAC No. 69161)"

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. Generic Letter 88-01 provides guidance for the changes to the Technical Specifications concerning implementation of an Inservice Inspection (ISI) Program for austenitic stainless steel piping in conformance with the staff position. In Reference 3, the NRC approved the use of an alternative measure, allowing the inspection of Category D and E welds to be conducted every three years. Changes to the following Technical Specifications are being requested:

4.0.5 Applicability, Surveillance Requirements
B 3/4.0.5 Applicability

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Page Two

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
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In addition, an editorial change is being requested for 3.4.3.2.d. The reference to Table 3.4.3.2-1 for the high/low pressure interface valve leakage pressure monitors is incorrect. This information is provided in Table 3.4.3.2-2.

This request for an amendment to the Technical Specifications also completes the Supply System response to the four open items discussed by the NRC in Reference 4.

The Supply System has reviewed the changes per 10 CFR 50.92 and provides the following in support of a finding for no significant hazards consideration. In fact, these changes being made in accordance with the Generic Letter issued by the NRC represent additional restrictions on the operation of WNP-2.

- 1) The changes to the ISI program do not involve a significant increase in the probability or consequences of an accident previously evaluated because inspections are not assumed as the initiator of any analyzed event. The increased surveillance requirements for inspections may facilitate early detection of a failure associated with IGSCC and serve to mitigate the consequences of such a failure, thereby enhancing safety.
- 2) The changes do not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed changes do not introduce any new mode of plant operation or require any physical modification to the plant.
- 3) There is no reduction in a margin of safety due to these changes because the additional inspections have been established to assure the earliest possible detection of problems with or the need of repair or replacement of piping that may be susceptible to failure due to IGSCC.

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. The change will involve an increase in individual and cumulative occupational radiation exposure. As discussed in Reference 2, the nozzle inspection during R7 resulted in approximately 57 man rem of exposure. The approved alternative to GL 88-01 will require certain inspections to be completed every 3 years, compared to the original ISI Program requirement of every 10 years. This could result in exposure increase of 150 man rem in each 10 year inspection cycle. The Supply System does not believe this change represents a significant increase in the occupational exposure. Also, this change will be less than would be seen if the inspection were completed every 2 years as specified by the Generic Letter. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and an environmental assessment of this change is not required, per 10 CFR 51.22(b).

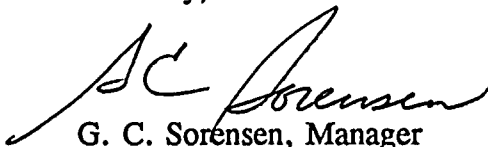
Page Three

**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS
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The change in the table reference is administrative and has no impact on the plant or plant operations.

This Technical Specification change 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,

A handwritten signature in cursive script, appearing to read "G. C. Sorensen".

G. C. Sorensen, Manager
Regulatory Programs (Mail Drop PE20)

MGE/bk
Attachments

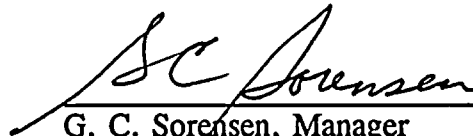
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NS Reynolds - Winston & Strawn
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STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Request for Amend to TS
In Accordance with GL 88-01

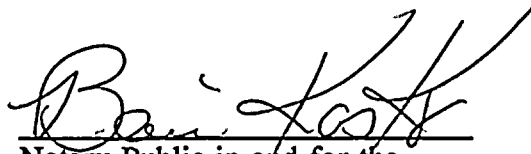
I, G. C. SORENSEN, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information,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

DATE 4/1, 1993


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 1 day of April 1993.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, Washington

My Commission Expires April 28, 1994

