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 PARRISH, J.V.    Washington Public Power Supply System  
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SUBJECT: Application for amend to license NPF-21, requesting rev to TS  
 TS by relocating requirements for seismic monitoring  
 instrumentation.

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January 6, 1994  
G02-94-003

Docket No. 50-397

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

**Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS TO  
RELOCATE REQUIREMENTS FOR SEISMIC MONITORING  
INSTRUMENTATION**

**Reference: Letter GO2-93-062 dated March 18, 1993, JW Baker (SS) to JB Martin (NRC),  
"Seismic Monitoring Instrumentation"**

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, the Supply System requests revision of the WNP-2 Technical Specifications consistent with the Commission's Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors as noticed in the Federal Register on July 22, 1993. The Technical Specification describing Seismic Monitoring Instrumentation does not meet the Technical Specification inclusion criteria provided in the Policy Statement. Additionally, Seismic Monitoring Instrumentation is not included in NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," dated September 28, 1992. This change will relocate the requirements related to Seismic Monitoring Instrumentation to the FSAR and plant procedures, which will be controlled pursuant to the requirements of 10 CFR 50.59 and Technical Specification 6.8.1.

The relocation of this requirement is requested in accordance with the Commission policy that licensees may adopt portions of the improved Standard Technical Specifications (STS) without fully implementing all Technical Specification improvements as stated in the supplementary information provided with the Final Policy Statement in the Federal Register. The Commission stated that Limiting Conditions For Operation (LCOs) which do not meet any of the four criteria cited below may be proposed for removal from the Technical Specifications and relocation to licensee-controlled documents, such as the FSAR. The Seismic Monitoring Instrumentation LCO is proposed for relocation based on failure to meet any of the four criteria for inclusion in the Technical Specifications.

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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS TO  
RELOCATE REQUIREMENTS FOR SEISMIC MONITORING INSTRUMENTATION**

The Technical Specification amendment requested consists of relocation of the requirements of Technical Specification LCO 3.3.7.2, Surveillance Requirements 4.3.7.2.1 and 4.3.7.2.2, Tables 3.3.7.2-1, "Seismic Monitoring Instrumentation" and 4.3.7.2-1, "Seismic Monitoring Instrumentation Surveillance Requirements" to the FSAR and plant procedures. In addition, the Bases for 3/4.3.7.2 is proposed for relocation to the FSAR.

The amendment is being requested at this time to support the planned relocation of the seismic monitoring instrument located on the space frame from within the primary containment structure to a location outside of the primary containment structure, yet which is representative of the existing location. There are two seismic monitors located within primary containment. One is located on the primary containment drywell floor and the other is located on the space frame structure surrounding the reactor vessel head. Neither of these monitors are accessible during plant operation or immediately following a seismic event. The space frame monitor is out of service during refueling outages for periods of time longer than 30 days due to refueling activities that require movement of the space frame. The referenced letter stated that the monitors would remain in their present locations. The decision to move them was driven by ALARA and maintenance considerations. The new locations are within secondary containment. The old drywell floor monitor will monitor the Reactor Building 522' floor. The old reactor vessel head monitor will monitor a CRD support on the Reactor Building 522' level.

This change is being made to facilitate access to the device for testing, maintenance, and in support of facility ALARA goals. The existing Technical Specifications specify the location of the instrument and a Technical Specification amendment is required to support the relocation. To minimize future amendment requests should additional changes be required, and continue the process of migration toward the improved STS, this amendment has been prepared to relocate the entire specification to the FSAR and plant procedures. The FSAR will contain the descriptive information which now exists in the Technical Specification, and the Surveillance Requirements will be relocated to plant procedures. Subsequent to receipt of the approved Technical Specification amendment, the Supply System plans to perform reviews in accordance with Technical Specification 6.8.1 and 10 CFR 50.59 to allow relocation of the instrument described above.

The Commission's Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors contains four criteria against which Technical Specification requirements are to be evaluated for inclusion in the Technical Specifications. Meeting any of the four criteria results in inclusion in the Technical Specifications. These criteria are:

1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.



**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS TO  
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2. A process variable, design feature, or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis that either assumes the failure of, or prevents a challenge to the integrity of a fission product barrier.
3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a Design Basis Accident or Transient analysis that either assumes the failure of or prevents a challenge to the integrity of a fission product barrier.
4. A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

The Seismic Monitoring Instrumentation proposed for relocation does not satisfy any of the four criteria listed above. A comparison of the criteria to the function of the Seismic Monitoring Instrumentation follows:

1. These instruments are not used for, nor capable of, detecting a significant abnormal degradation of the reactor coolant pressure boundary.
2. These instruments do not monitor a process variable that is an initial condition to a Design Basis Accident or Transient analysis. Nor are they a design feature or operating restriction that is an initial condition of a Design Basis Accident or Transient analysis.
3. These instruments do not act as part of a primary success path in the mitigation of a Design Basis Accident or Transient.
4. The Supply System does not believe that there exists any operating experience or probabilistic safety assessment which has shown the function of these instruments to be significant to the public health and safety.

These conclusions are confirmed by the exclusion of the Seismic Monitoring Instrumentation requirements from NUREG-1433, "Standard Technical Specifications, General Electric Plants, BWR/4," dated September 28, 1992.

The Supply System has evaluated the proposed change in accordance with the requirements of 10 CFR 50.92 and determined it does not represent an unreviewed safety question or a significant hazard because it does not:



**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS TO  
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- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated. The relocation of this specification from the Technical Specifications to the FSAR and plant procedures is administrative in nature since the requirements described in the specifications will be maintained. No accident analyses rely on the components affected. The plant procedures will only be revised to reflect the relocation of the requirements. Any subsequent changes to the plant procedures or the FSAR will be made in accordance with Technical Specification 6.8.1 and 10 CFR 50.59. Since this change does not affect seismic instrument design, testing, or operation, the probability or consequences of previously evaluated accidents are not impacted.
- 2) Create the possibility of a new or different kind of accident from any previously evaluated. The relocation of the requirements to a licensee controlled document is administrative in nature. The proposed amendment does not involve a change in the manner in which the plant will be operated, maintained, or tested. The requirements will be maintained under appropriate administrative controls. Therefore a new or different kind of accident as a result of this change is not credible.
- 3) Involve a significant reduction in a margin of safety. These instruments have no affect on the margin of safety of the plant. The function they provide is to monitor and record seismic events which could occur. No change in the operability or surveillance requirements is being proposed. Any changes made subsequent to relocation of the requirements will be made in accordance with the requirements of Technical Specification 6.8.1 and 10 CFR 50.59.

As discussed above, the Supply System considers that the proposed change does not involve a significant hazards consideration, nor is there a potential for a change in the types, or increase in the amount, of any effluent that may be released offsite, nor does it involve an 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). Therefore, in accordance with 10 CFR 51.22(b), an environmental assessment of this change is not required.

It is requested that the implementation period be 30 days from receipt. This will be the period allowed for incorporation of the amendment into controlled copies of the Technical Specifications held by the Supply System. Because the Technical Specification change is administrative in nature and does not result in a change in requirements, the resulting changes in procedures and the FSAR will be treated as administrative and will be made at the next available opportunity. Special procedure revisions to delete reference to the relocated Technical Specification will thus not be made. As stated above, the specified surveillance testing will continue to be performed at the existing frequency with any future changes to these requirements made in accordance with Technical Specification 6.8.1 and 10 CFR 50.59.

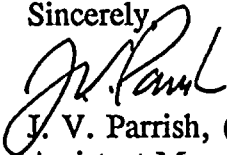


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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS TO  
RELOCATE REQUIREMENTS FOR SEISMIC MONITORING INSTRUMENTATION**

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.

Sincerely,



J. V. Parrish, (Mail Drop 1023)  
Assistant Managing Director, Operations

KWG/kg  
Attachments

cc: KE Perkins - NRC RV  
NS Reynolds - Winston & Strawn  
W Bishop - EFSEC  
JW Clifford - NRR  
DL Williams - BPA  
NRC Site Inspector - 927N

STATE OF WASHINGTON )  
COUNTY OF BENTON )

Subject: Request for Amend to Relocate  
Requirements for Seismic Monitoring

I, J. V. PARRISH, being duly sworn, subscribe to and say that I am the Assistant Managing Director, Operations 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 January 6, 1994

J. V. Parrish  
J. V. Parrish, Assistant Managing Director  
Operations

On this date personally appeared before me J. V. PARRISH, 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 6th day of January, 1994.

B. K. K.  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 4/28/94

