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PARRISH, J.V. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION

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SUBJECT: Application for amend to license NPF-21, requesting changes to TS by increasing licensed power level from 3323 MWT to 3486 MWT w/extended load line limit & change SRV setpoint tolerance.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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January 6, 1994
G02-94-004

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 FACILITY OPERATING LICENSE
AND TECHNICAL SPECIFICATIONS TO INCREASE LICENSED POWER
LEVEL FROM 3323 MWT TO 3486 MWT WITH EXTENDED LOAD LINE
LIMIT AND A CHANGE IN SAFETY RELIEF VALVE SETPOINT
TOLERANCE, SUPPLEMENTAL INFORMATION**

Reference: Letter G02-93-180, dated July 9, 1993, JV Parrish (SS) to NRC, same subject

The reference requested a change to the WNP-2 License and several sections of the WNP-2 Technical Specifications and Bases to support implementation of a power uprate program with Extended Load Line Limit and a change in Safety Relief Valve Setpoint Tolerance. Submitted with the reference, as supporting information for this request, was NEDC-32115P, "Washington Public Power Supply System Nuclear Project 2, SAFER/GESTR-LOCA Loss-of-Coolant Accident Analysis," Class III (Proprietary) Revision 2, July 1993. NEDC-32115P was provided to confirm the adequacy of the ECCS under the requested uprate conditions. Inherent in the NEDC-32115P analysis were fuel performance specifications necessary to preserve the conclusions of the analysis. As such, the NEDC-32115P analytical methodologies used to assure that the ECCS uprate analysis is satisfied must be included in Technical Specification paragraph 6.9.3.2, which lists analytical references used to determine the core operating limits for each cycle reload. The need to include this information was not recognized at the time the reference was submitted.

Hence, in accordance with the Code of Federal Regulations, Title 10 Parts 50.90 and 2.101, this letter requests that the Technical Specification change submitted in the reference also include the changes to Technical Specification paragraph 6.9.3.2, see attached, necessary to ensure that reload cycles support the conclusions of NEDC-32115P. The addition of the two references is

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ADD 1

REQUEST FOR AMENDMENT TO FACILITY OPERATING LICENSE AND TECHNICAL SPECIFICATIONS TO INCREASE LICENSED POWER LEVEL FROM 3323 MWT TO 3486 MWT WITH EXTENDED LOAD LINE LIMIT AND A CHANGE IN SAFETY RELIEF VALVE SETPOINT TOLERANCE, SUPPLEMENTAL INFORMATION

considered to be an administrative change. Both references have been previously reviewed and approved by the NRC. The addition of these two references imposes additional requirements to ensure that Core Operating Limits Reports (COLRs) preserve the ECCS conclusions of the uprate analysis.

The Supply System has evaluated the addition of these two references to Technical Specification paragraph 6.9.3.2 with respect to 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 addition of these two references represents additional requirements to ensure that plant response to previously evaluated accidents remains within the design requirements of the uprate submittal, and the uprate submittal has been evaluated as not being a significant hazards concern, this change also does not involve a significant increase in the consequences of previously evaluated accidents. To the contrary, this change assures that the consequences of previously evaluated accidents will remain within the bounds of the analysis provided by the referenced uprate submittal. Because the fuel performance specifications in the ECCS performance evaluation of the uprate submittal are not credited with initiating a previously evaluated accident the probability of a previously evaluated accident with or without this change remains the same. Therefore incorporation of these two references to the WNP-2 Technical Specifications will not alter the probability, nor increase the consequences of a previously evaluated accident.
- 2) Create the possibility of a new or different kind of accident from any accident previously evaluated. The proposed additions introduce no new mode of plant operation nor do they require physical modification of the plant. The addition of these two references ensures that reload submittals remain bounded by appropriate analysis. Hence the possibility of a new or different kind of accident than those previously evaluated is not created by this change.
- 3) Involve a significant reduction in a margin of safety. Imposition of additional requirements to ensure that plant parameters remain within approved analyses does not create a reduced margin of safety. The addition of these two references ensures that the margin of safety created by the uprate analysis is not threatened. Imposition of these two references ensures that the reload analysis and fuel performance specifications will be

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TECHNICAL SPECIFICATIONS TO INCREASE LICENSED POWER LEVEL FROM
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IN SAFETY RELIEF VALVE SETPOINT TOLERANCE, SUPPLEMENTAL
INFORMATION**

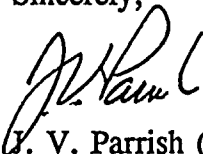
bounded by the uprate analysis which has also been determined not to reduce a margin of safety. Accordingly, the addition of these two references, which will assure adherence to the uprate analysis assumptions and methodologies, likewise does not represent a significant reduction in a margin of safety.

As discussed above, the Supply System concludes that the addition of the two references to Technical Specification 6.9.3.2 does not involve a significant hazards consideration, nor is there a potential for a significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does the addition of these two references involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change adding the two references 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 this change 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.

This submittal is considered to be of an administrative nature, supportive of the uprate submittal and it is requested that this change be reviewed and approved concurrently as supplemental information to that provided in the reference.

Sincerely,



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

PLP/bk
Attachments

cc: KE Perkins - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector - 927N
W Bishop - EFSEC

STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Request for Amend to License & TS
Paragraph 6.9.3.2

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.

Brian Kest
Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennelworth, WA

My Commission Expires 4/28/94

