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SUBJECT: Requests inclusion of addl admin change in supply sys request for amend to TS 3/46.1.8 for containment purge supply & exhaust valves.

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March 25, 1994
G02-94-069

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 3/4.6.1.8, DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM - SUPPLEMENTAL INFORMATION**

Reference:

1) Letter, dated April 29, 1987, DM Crutchfield (NRR) to GC Sorensen (SS), "Issuance of Exemption to a Provision of Appendix J and Amendment No. 41 to Facility Operating License No. NPF-21 WPPSS Nuclear Project No. 2"

2) Letter GO2-93-296, dated December 20, 1993, JV Parrish (SS) to USNRC, "Request for Amendment to Technical Specification 3/4.6.1.8, Drywell and Suppression Chamber Purge System"

The purpose of this letter is to request inclusion of an additional administrative change in the Supply System's request for amendment to Technical Specification 3/4.6.1.8 for the Containment Purge Supply and Exhaust Valves. This amendment request was provided by Reference 2 and requested modification of the Limiting Condition for Operation (LCO), action statement, and associated surveillance requirement limiting valve travel; the surveillance associated with a six month test interval for resilient seated valves; enhancement of an action statement; and an administrative change.

Although not included in the original Technical Specification change request, the Supply System requests that the NRC staff include the enclosed change to Technical Specification 3/4.6.1.2, "Primary Containment Leakage." This change is necessary because the Reference 2 amendment request deleted surveillance 4.6.1.8.1 in modifying valve travel limits, and surveillances 4.6.1.8.2 and 4.6.1.8.3 were renumbered accordingly. However, the renumbering was not addressed for related Technical Specification Surveillance 4.6.1.2i, which references surveillances 4.6.1.8.2 and 4.6.1.8.3. Therefore, this additional administrative change is requested in order to renumber the surveillances included in 4.6.1.2i and provide consistency between Technical Specification 3/4.6.1.2 and 3/4.6.1.8.

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REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 3/4.6.1.8, DRYWELL AND SUPPRESSION CHAMBER PURGE SYSTEM SUPPLEMENTAL INFORMATION

The Supply System believes that the basis for the "No Significant Hazards Consideration" determination in Reference 2 envelopes this administrative change since the determination addresses the deletion of surveillance 4.5.1.8.1 and renumbering of 4.5.1.8.2 and 4.5.1.8.3. However, as this administrative change request is submitted separate from Reference 2, a new basis for "No Significant Hazards Consideration" determination is provided in Attachment 1 for the proposed change to surveillance 4.6.1.2i.

Based on the review of the three standards of 50.92(c), the Supply System has determined that this amendment request involves no significant hazards consideration.

A copy of the proposed change is included in Attachment 2.

Should you have any questions or desire additional information regarding this matter, please call me or Herbert E. Kook at (509) 377-4278.

Sincerely,

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

HEK/bk
Attachments

cc: KE Perkins, Jr. - NRC RV
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Site Inspector 927N

Attachment 1
Request for Amendment to Technical Specification 3/4.6.1.8,
Drywell and Suppression Chamber Purge System
Supplemental Information

NO SIGNIFICANT HAZARDS EVALUATION

Description of amendment request: The proposed change would make an administrative change to Technical Specification 3/4.6.1.2, "Primary Containment Leakage." Specifically, the proposed amendment would renumber the surveillances which are referenced in Surveillance 4.6.1.2i. Presently, this surveillance refers to "Surveillance Requirements 4.6.1.8.2 and 4.6.1.8.3" for purge supply and exhaust isolation valve operability testing. This change would modify that reference to "Surveillance Requirements 4.6.1.8.1 and 4.6.1.8.2."

Background: This change is necessary due to a related amendment request associated with the changeout of the containment purge supply and exhaust valves. This request, submitted by Supply System letter GO2-93-296, dated December 20, 1993, requests modification of the Limiting Condition for Operation (LCO), action statement, and associated surveillance requirement limiting valve travel; the surveillance associated with a six month test interval for resilient seated valves; enhancement of an action statement; and an administrative change. This amendment request deleted surveillance 4.6.1.8.1 in modifying valve travel limits, and surveillances 4.6.1.8.2 and 4.6.1.8.3 were renumbered accordingly. However, the renumbering was not addressed for related Technical Specification Surveillance 4.6.1.2i, which references surveillances 4.6.1.8.2 and 4.6.1.8.3. Therefore, this additional administrative change is requested in order to renumber the surveillances included in 4.6.1.2i and provide consistency between Technical Specification 3/4.6.1.2 and 3/4.6.1.8.

Basis for proposed no significant hazards consideration determination: As required by 10 CFR 50.91(a), the Supply System has performed an analysis of the issue of no significant hazards consideration. The analysis provided in the Supply System's request for amendment dated December 20, 1993 focuses on deletion of Surveillance 4.6.1.8.1 and renumbering of surveillances 4.6.1.8.2 and 4.6.1.8.3. This analysis envelopes this administrative change to Technical Specification Surveillance 4.6.1.2i. However, as this amendment request is submitted separate from Reference 2, a new basis for "No Significant Hazards Consideration" determination is presented below for this administrative change:

Attachment 1
Request for Amendment to Technical Specification 3/4.6.1.8,
Drywell and Suppression Chamber Purge System
Supplemental Information

1. Does the amendment involve a significant increase in the probability or consequences of an accident previously evaluated?

This administrative change that is made to provide consistency between Technical Specifications 3/4.6.1.2 and 3/4.6.1.8. Containment purge supply and exhaust valves are credited with containment isolation during LOCA or steam line break design basis accidents. The surveillances required to establish operability of these isolation valves were not modified. The surveillances were simply renumbered. Renumbering the surveillances has no impact on FSAR accident analyses. This change does not increase the probability or consequences of a previously analyzed accident.

2. Does the amendment create the possibility of a new or different kind of accident from any accident previously evaluated?

No new mode of operation of any equipment results form this administrative change. This change renumbers surveillances associated with the containment purge supply and exhaust valves. It modifies Technical Specification Surveillance 4.6.1.2i to renumber referenced surveillances 4.6.1.8.2 and 4.6.1.8.3 to surveillances 4.6.1.8.1 and 4.6.1.8.2. The surveillances, which provide operability assurance for the containment purge supply and exhaust valves, are not modified in any way. Accordingly, operability of these valves is not compromised in any manner. System operability provides assurance that radioactive materials will not be released via the purge system. This change would not, therefore, create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Does the amendment involve a significant reduction in the margin of safety?

This administrative change is made to ensure consistency between Technical Specification 3/4.6.1.2 and 3/4.6.1.8. Surveillance requirements are not changed therefore operability of the containment purge supply and exhaust valves is not impacted. The proposed change does not, therefore, affect the margin of safety.

In preparing this request the Technical Specification Bases were reviewed for impact. No changes were necessary.

Based on this review, the Supply System has determined that the three standards of 50.92(c) are satisfied. Accordingly, the Supply System has determined that this amendment request involves no significant hazards consideration.