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SUBJECT: Provides addl info in support of 940208 request to change stroke time of RCIC-V-8 as shown in TS Table 3.6.3-1.

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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
TABLE 3.6.3-1, PRIMARY CONTAINMENT ISOLATION VALVES,
ADDITIONAL INFORMATION**

Reference: Letter G02-94-035, dated February 8, 1994, JV Parrish (SS) to NRC, "Request
for Amendment to Technical Specification Table 3.6.3-1, Primary Containment
Isolation Valves"

This letter provides additional information in support of the referenced request to change the stroke time of RCIC-V-8 as shown in Technical Specification Table 3.6.3-1.

The Supply System has evaluated the consequences of breaches in the reactor coolant boundary outside of primary containment for all high energy piping, including RCIC. The complete severance of one of the four main steam lines was determined to be the limiting fault, as documented in Chapter 15.6 of the FSAR. The main steam line break (MSLB) analysis assumes the break is downstream of the outboard main steam isolation valve and is thus released directly to the environment without filtering through the standby gas treatment (SGT) system. Chapter 6.3 of the FSAR presents ECCS performance for the spectrum of BWR system piping failures outside of containment including the MSLB. No fuel damage occurs as a consequence of this accident and the dose consequences from the MSLB to the public are limited to less than 10% of the 10 CFR 100 limits. Evaluation of the high energy line break (HELB) dose consequences due to changes in the stroke time for RCIC-V-8 and RCIC-V-63 have been compared with the MSLB and they remain bounded by the MSLB event. Mass and energy release for the RCIC HELB event with the increased stroke times remain well below the MSLB event. Therefore, the offsite and control room dose for the HELB in the RCIC system are less than 10% of the 10 CFR 100 limits.

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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
TABLE 3.6.3-1, PRIMARY CONTAINMENT ISOLATION VALVES,
ADDITIONAL INFORMATION**

As stated in Appendix J, Section 2.3 of the WNP-2 FSAR, the Supply System has taken exception to NUREG-660 II.B.2 in regard to analyzing degradation of safety related equipment due to radiation during post accident conditions. As discussed in Chapters 6.3 and 15.6.4, the plant response to isolate the break and to reflood the core precludes fuel damage. Therefore, an HELB does not mechanistically lead to fuel damage and radiation release. Releases would be limited to the activity present in the reactor coolant at the time of the break. This is controlled by the Technical Specification limit of $0.2 \mu\text{Ci/gm}$ dose equivalent I-131. The total release would be less than 10% of the 10 CFR 100 limits. Also, the current equipment qualification accident profiles and analyses envelop the changed conditions, and ensure that equipment will function as designed to mitigate the consequences of an accident.

In summary, the dose consequences of the MSLB are limited to less than 10% of 10 CFR 100 limits and the postulated RCIC HELB is bounded by the MSLB. This ensures that the increased allowable stroke time for RCIC-V-8 would not lead to dose consequences greater than 10% of the 10 CFR 100 limits and that releases would not cause an unacceptable impact on equipment qualification.

If you have any questions or desire additional information, please call me or H. E. Kook at (509) 377-4278.

Sincerely,



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

MGE/bk

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