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SUBJECT: Responds to request for addl info re 940217 request for amend to TS to support hydrostatic testing.

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R I D S / A D D S

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

May 13, 1994
G02-94-116

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**
RESPONSE TO REQUEST FOR ADDITIONAL INFORMATION

Reference: Letter GO2-94-042 dated February 17, 1994, JV Parrish (SS) to NRC, "Request to Amend Technical Specifications to Support Hydrostatic Testing"

The Supply System is submitting additional information in response to a request by Mr. L. M. Padovan of your staff. The attachment contains the information request and the Supply System response.

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

Sincerely,

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

MGE/kd
Attachment

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
JW Clifford - NRC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 901A

A001

ATTACHMENT

1. How are reactor coolant system (RCS) average and maximum temperatures determined during the hydrostatic test?

Supply System Response

Average RCS temperature will not be monitored during the testing. Maximum coolant temperatures will be determined from the temperature sensor in the suction piping of the operating reactor recirculation pump. Reactor pressure vessel (RPV) metal temperature will be determined from the minimum indication using the temperature sensors mounted on the RPV top and bottom heads, on the RPV flange, and below the RPV flange.

2. What is the planned duration for the hydrostatic testing? Are there any maximum time restrictions on the testing?

Supply System Response

The planned duration at test pressure is expected to be less than fourteen hours. This includes the four hour hold time plus the examination period. There are no maximum time restrictions.

3. What shutdown cooling capability will be available during this evolution and what assures its availability?

Supply System Response

Although the proposed "Special Test Exception" 3/4.10.7, suspends the requirements of LCO 3.4.9.2, the shutdown cooling (SDC) capability will be provided, if needed, by an alternate SDC path as specified in Technical Specification 3/4.4.9.2, "Cold Shutdown." The path will use the Residual Heat Removal (RHR) loops and the appropriate Main Steam Relief Valves (MSRV). These alternative methods are necessary because the normal SDC mode of the RHR system will not be immediately available due to maintenance planned of the suction valve. A contingency plan has been developed to assure the availability of the normal SDC within four hours of identifying the need for this mode.

4. a) What will be the actual RPV pressure during the test, and how will pressure be controlled?

Supply System Response

Test pressure will be maintained, between 1005 psig and 1035 psig, using the Control Rod Drive (CRD) system flow controller and an air bubble in the RPV.

b) What overpressure protection is used and will rapid depressurization capability be available? What are the contingency plans if there is a problem with these capabilities?

Supply System Response

The normal RPV overpressure protection provided by the MSRVs will be available during the duration of the testing. Blow down paths through the main steam line drains or the reactor water cleanup system to the main condenser will also be available during the testing. The CRD pumps will be the only high pressure injection source in use. Therefore, tripping the pumps will also stop a pressure increase. Each method will provide rapid depressurization.

5. What is the status of primary containment during the test (i.e., will the drywell head be in place and what primary containment penetration will be open or inoperable)? What will be the capability to set (re-establish) primary containment (explain required steps and the time needed)?

Supply System Response

The drywell head will be in place, but there are no plans to establish or verify the Technical Specification requirements for operability of primary containment during the testing. The personnel access hatch will be opened to allow personnel and equipment access during the test. However, if needed, securing the hatch would not be difficult or time consuming. Although secured, the containment would not be considered operable under the Technical Specifications.

6. With respect to the proposed TS 3/4.10.7:

a) Why is decay heat not mentioned? Would this omission allow the test to be performed with a "high" decay heat load?

Supply System Response

To maintain consistency with the improved standard technical specifications (ITS) (NUREG 1433 and 1434), decay head load was not mentioned in the Limiting Condition for Operation. Although performance of the testing is not jeopardized by a high decay heat load, there are no plans for performing the testing during those conditions.

b) What is the basis for the selection of the 24 hours in the action statement?

Supply System Response

Again, in keeping with the guidance provided by the NRC in the ITS, the 24 hour action was specified. As discussed in the ITS, the 24 hours time was selected based upon engineering judgement and is consistent with the time provided in LCO 3.0.3 to reach Mode 4 from Mode 3.

c) What OPERATIONAL CONDITION 3 LCO's are omitted from this list?

Supply System Response

3.3 INSTRUMENTATION

3.3.1 RPS
TABLE 3.3.1-1
Item 2. APRM
a) neutron flux high - setdown
b) flow biased simulated thermal power - high

3.3.2 ISOLATION
all instrumentation except items 2a, 2c, and 2d

3.3.3 ECCS ACTUATION

TABLE 3.3.3-1
Item 1.b, drywell pressure - high - all 3 Divisions
Item 2, all ADS - in Division I and II

3.3.5 RCIC ACTUATION

3.3.7.1 RADIATION MONITORING
TABLE 3.3.7.1-1
Item 1, main control room ventilation radiation monitors

3.3.7.5 ACCIDENT MONITORING
TABLE 3.3.7.5-1
Item 28, Primary containment gross radiation
Item 31, Reactor building effluent

3.4 REACTOR COOLANT

3.4.2 SAFETY/RELIEF VALVES
3.4.3 RCS LEAKAGE

3.4.3.1 Leak detection systems
3.4.3.2 Operational leakage

3.4.5 SPECIFIC ACTIVITY
TABLE 4.4.5-1
Item 1

3.4.7 MSIVs

3.4.9.1 RHR SHUTDOWN COOLING

3.5.1 ECCS OPERATING

3.6 CONTAINMENT

3.6.1.1 Containment Integrity
3.6.1.2 Containment Leakage
3.6.1.3 Air Locks
3.6.1.4 Main steam leakage control

3.6.1.6 Internal pressure
3.6.1.7 Average air temperature
3.6.1.8 Purge system
3.6.2.1 Suppression chamber
3.6.2.2 Containment spray
3.6.2.3 Suppression pool cooling

3.6.3 Isolation valves

3.6.4.1 Vacuum relief, Drywell
3.6.4.2 Vacuum relief, Suppression Chamber

3.7.3 RCIC

3.8 ELECTRICAL POWER

3.8.1.1 AC sources, operating
3.8.2.1 DC sources, operating
3.8.3.1 Power distribution, operating
3.8.4.1 AC circuits in containment
3.8.4.2 Penetration over current protection

The following LCOs are required in both MODES 3 and 4. Any action statements entered will be those applicable to MODE 4.

3.4.4 RCS CHEMISTRY

3.4.5 RCS Specific Activity
Table 4.4.5-1
Item 4

3.7 PLANT SYSTEMS

3.7.1.3 Ultimate heat sink

3.7.2 Control room filtration

3.7.4 Snubbers

3.7.8 Area Temperature Monitoring