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SUBJECT: Application for amend to license NPf-21, requesting amend to
 TS, relocation of TS table for instrument response time
 limits.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352-0968 • (509) 372-5000

July 12, 1994
GO2-94-160

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 THE TECHNICAL SPECIFICATIONS,
RELOCATION OF TECHNICAL SPECIFICATION TABLES FOR
INSTRUMENT RESPONSE TIME LIMITS**

Reference: Generic Letter, 93-08 dated December 29, 1993, NRC to All Holders
of Operating Licenses for Nuclear Power Reactors, "Relocation of
Technical Specification Tables of Instrument Response Time Limits"

In accordance with the Code of Federal Regulations, Title 10 Parts 50.90 and 2.101, the Supply System hereby requests an amendment to the WNP-2 Technical Specifications. This submittal requests that instrument response time limit tables for the Reactor Protection System (RPS), Isolation Actuation and Emergency Core Cooling System (ECCS) be relocated to the WNP-2 Final Safety Analysis Report (FSAR) [see Attachment 3]. This request is made in accordance with the guidance in the referenced Generic Letter.

Generic Letter 93-08 states that relocating instrument response time limit tables to the FSAR will not alter the surveillance requirements of the Technical Specifications. The Supply System concurs with this statement. WNP-2 Plant surveillance procedures specify acceptance criteria that implement the response time limits proposed for relocation. The relocated time limits will be controlled as part of the FSAR. Changes to the FSAR and plant procedures are evaluated and controlled in accordance with 10 CFR 50.59.

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**REQUEST FOR AMENDMENT, RELOCATION OF TECHNICAL SPECIFICATION
TABLES FOR INSTRUMENT RESPONSE TIME LIMITS**

The 10 CFR 50.59 process requires any change that results in a plant response more severe than, or different from, the current accident analysis to be submitted to the NRC for review and approval prior to implementation. Those changes to the FSAR that do not adversely impact the accident analysis are implemented and submitted as an update to the FSAR as required by 10 CFR 50.71(e). For these reasons the relocated instrument response time limit tables will continue to be appropriately controlled. Changes to the limits will not be made without adequate review and approval. Therefore, relocating the tables does not alter compliance to the WNP-2 Technical Specifications.

Attachment 1 provides discussion of and justification for the change. Attachment 2 is a No Significant Hazards evaluation of the change, and Attachment 3 is the affected pages of the WNP-2 Technical Specifications and Bases reflecting the change. It should be noted that the footnotes at the bottom of pages 3/4 3-11 and 3/4 3-25 can be deleted as they are no longer effective. Also, Technical Specification page 3/4 3-21 has another pending change that could affect it. However, as indicated in Attachment 3 the proposed change, submitted in October 1993 will also be removed from the Technical Specifications with approval of this amendment request.

As discussed in Attachment 2, the Supply System has concluded that this change 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 change involve a significant 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) and therefore, in accordance with 10 CFR 51.22(b), an environmental assessment of the 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.



Age Group	1996 (%)	2000 (%)
18-29	85	75
30-49	75	65
50-69	65	55
70+	55	45

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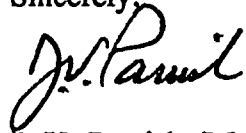
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**REQUEST FOR AMENDMENT, RELOCATION OF TECHNICAL SPECIFICATION
TABLES FOR INSTRUMENT RESPONSE TIME LIMITS**

It is requested that the change be made effective thirty days following approval of this submittal.

Should you have any questions or desire additional information regarding this matter, please call me or P. R. Bemis, Manager, Regulatory Programs at (509) 377-4027.

Sincerely,



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

Attachments

cc: LJ Callan - NRC RIV
NRC Sr. Resident - 927N
NS Reynolds - Winston & Strawn
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
DL Williams - BPA/399
FS Adair - EFSEC
JW Clifford - NRC

STATE OF WASHINGTON)
)

Subject: Request for Amend to TS, Relocation of
TS Tables for Response Time Limits

COUNTY OF BENTON)


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 12 July, 1994


J. V. Parrish, Assistant Managing Director
Operations

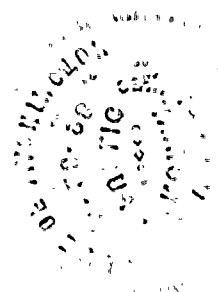
On this date personally appeared before me J. V. PARRISH, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 12 day of July, 1994.


Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennelworth, WA

My Commission Expires 4/28/98



REQUEST FOR AMENDMENT, RELOCATION OF TECHNICAL SPECIFICATION TABLES FOR INSTRUMENT RESPONSE TIME LIMITS

Attachment 1
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DISCUSSION AND JUSTIFICATION OF CHANGE

The RPS, Isolation Actuation and ECCS Instruments provide signals to the actuation logic for safety equipment that is needed to mitigate accidents and transients. The relocation of the response time tables from the Technical Specifications to the FSAR will not affect this safety function. Relocation does not change the operability or surveillance requirements for these instruments from the existing Technical Specification requirements.

Nor will relocation allow changes to be made in the response time limits without adequate review and approval. When relocated, proposed changes to the FSAR list of response time limits will be processed under the administrative controls of 10 CFR 50.59. The 10 CFR 50.59 process will require any change to the instrument response times that results in a plant response more severe than, or different from, the current accident analysis to be submitted to the NRC for review and approval as an unreviewed safety question prior to implementation. Changes to the FSAR evaluated and determined not to be an unreviewed safety question would be implemented and submitted as an update to the FSAR as required by 10 CFR 50.71(e).

Plant Procedure PPM 1.1.5, "Plant Operations Committee" (POC) requires POC to review:

"all safety related procedures and programs covering activities referenced in Section 6.8 of the Technical Specifications and changes thereto, and any other procedures, programs or changes thereto as determined by the Plant Manager to affect nuclear safety."

Section 6.8.1 of the Technical Specifications presently requires that:

"written procedures shall be established, implemented, and maintained covering," (6.8.1.d), "surveillance and test activities of safety related equipment."

The administrative controls of 10 CFR 50.59 and the POC responsibilities will ensure that the relocated instrument response time limit tables will continue to be controlled and changes to the limits will only be allowed after adequate review and approval. Hence, relocation will neither affect the safety function of the instruments nor allow the safety function to be impacted by a change that has not had an adequate review and approval.

As stated in the referenced generic letter, each licensee who wishes to implement this improvement to their Technical Specifications should confirm that the plant procedures which govern or control response time testing include acceptance criteria that implement the limits which will be relocated to the FSAR. The Supply System hereby confirms that the WNP-2 procedures include acceptance criteria that implement the response time limits which will be relocated to the FSAR. It should be noted that the Supply System recently completed a Technical Specification Surveillance Improvement Project (TSSIP). TSSIP reviewed the

**REQUEST FOR AMENDMENT, RELOCATION OF TECHNICAL SPECIFICATION
TABLES FOR INSTRUMENT RESPONSE TIME LIMITS**

Attachment 1
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DISCUSSION AND JUSTIFICATION OF CHANGE (continued)

adequacy of the plant surveillance procedures. Some surveillance procedures, to be performed during the 1995 refueling outage, require modification to address discrepancies identified by TSSIP. The TSSIP program, findings, and corrective actions are described in WNP-2 Licensing Event Report No. 93-10 and supplementary reports there to.

The Generic Letter also requires that a commitment be made to include the relocated response time limits in the next update of the FSAR. Accordingly, the Supply System will include the relocated instrument response time limits in the next FSAR update after approval of this amendment request in accordance with the schedule requirements of 10 CFR 50.71.

REQUEST FOR AMENDMENT, RELOCATION OF TECHNICAL SPECIFICATION TABLES FOR INSTRUMENT RESPONSE TIME LIMITS

Attachment 2
Page 1 of 2

NO SIGNIFICANT HAZARDS EVALUATION

In accordance with 10 CFR 50.92, the Supply System has evaluated relocating the response time limit tables from the Technical Specifications to the FSAR and determined that the change does not represent a significant hazards consideration. The following is provided in support of this conclusion.

- 1) Does the change involve a significant increase in the probability or consequences of an accident previously evaluated?

The RPS, Isolation Actuation and ECCS Instruments provide signals to the actuation logic for safety equipment needed to mitigate accidents and transients. The proposed change relocates the instrument response times from the Technical Specifications to the FSAR but will not affect the operability or surveillance requirements of the affected instruments. The instruments will continue to be proven operable on the schedule provided in the Technical Specifications. The FSAR change process and Plant Operations Committee review responsibilities ensure that changes to the response time limits cannot be made without adequate review and approval. Since operability confirmation as required by the Technical Specifications (surveillance testing requirements) will not be affected by the change and the limits themselves cannot be altered without adequate review and approval, there is no possibility of a significant increase in the probability of an accident previously approved as a result of this change.

The instruments provide signals to the actuation logic of equipment used to mitigate the consequences of an accident. However, since no changes are being made in the methods or frequencies of proving operability the systems will not be degraded or be made susceptible to degradation that could go unidentified. As discussed above, changes to the limits will not be made without adequate review and approval. Hence, this change will not affect the capability of the plant to mitigate a previously evaluated accident. Because the mitigative capability is not affected there is no significant increase in the consequences of a previously evaluated accident as a result of this change.

For the above reasons, the change does not represent a significant increase in the probability or consequences of an accident previously evaluated.

- 2) Does the change create the possibility of a new or different kind of accident from any accident previously evaluated?

The proposed change relocates only the tables containing the instrument response times for the RPS, Isolation Actuation and ECCS response time limits from the Technical Specifications to the FSAR. The change does not affect how these instruments will function. Relocation of this information does not represent a change in the configuration or operation of the plant. No new hardware is being added to the plant as part of the proposed change. Plant procedures are not affected by the change. The Technical



**REQUEST FOR AMENDMENT, RELOCATION OF TECHNICAL SPECIFICATION
TABLES FOR INSTRUMENT RESPONSE TIME LIMITS**

Attachment 2
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NO SIGNIFICANT HAZARDS EVALUATION (continued)

Specification sections for the surveillance testing of these instruments will not be affected. Therefore, the Technical Specifications will continue to require that the same operability and surveillance requirements be met for the affected instruments.

Consequently, the possibility of a new or different kind of accident from any accident previously analyzed is not introduced as a result of this change.

3) Does the change involve a significant reduction in a margin of safety?

The margin of safety established by the response time limits is in ensuring that the RPS, Isolation Actuation and ECCS systems will respond in time to support the assumptions of the accident analysis. Relocating the response time limits to the FSAR does not alter the operability or the surveillance requirements applicable to the affected instruments. These instruments will continue to be tested for operability and therefore remain capable of responding to accident events within the time limits required by the accident analysis. The administrative change control provisions for the FSAR, the plant procedures implementing the requirements of 10 CFR 50.59 and the administrative sections of the Technical Specifications are adequate to control changes to the response time limits such that they cannot be altered in a manner that would adversely affect plant safety.

Therefore, for these reasons, the change does not involve a significant reduction in a margin of safety.