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FACIL:50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe 05000397
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SUBJECT: Application for amend to license NPF-21,amending WNP-2 TS 4.0.5,surveillance requirements for inservice insp & testing program.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 8, 1994
G02-94-186

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 4.0.5, SURVEILLANCE REQUIREMENTS FOR INSERVICE INSPECTION AND TESTING PROGRAM

Reference: NUREG-1482, published November 1993, Draft Report for Comment, "Guidelines for Inservice Testing at Nuclear Power Plants"

In accordance with the Code of Federal Regulations, Title 10 Parts 50.90 and 2.101, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications. This submittal requests that Section 4.0.5 be revised to delete the phrase "(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i)." A corresponding change to the Bases for 4.0.5 and 3/4.4.8 are also attached. This request follows the recommendation of the referenced NUREG.

An administrative change adding an inspection frequency of "Biennially or every 2 years....At least once per 731 days" to the 4.0.5.b schedule for testing is also included with this change request.

NUREG-1482 recommends that licensees revise their Technical Specifications to reflect the intent of the improved Standard Technical Specifications (ITS) [NUREGs 1433/1434] for the inservice inspection and testing (ISI/IST) programs. Consistent with this NUREG, upon finding an ASME Code requirement impractical because of prohibitive dose rates or limitations in the design, construction, or system configuration, the Supply System could submit a relief request

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provided that the proposed relief request had been (1) reviewed pursuant to 10 CFR 50.59; (2) approved by the plant staff in accordance with the administrative process described in the ISI/IST programs administrative procedures; and (3) reviewed by the Plant Operations Committee. The relief request would be implemented at that time and plant operation would continue.

Presently the phrase in 4.0.5.a "except where specific written relief has been granted" could mean that without an approved relief request any equipment not in conformance with the Code, or testable per the Code, would be declared inoperable. This would cause the plant to be placed in an operating condition that does not require the equipment to be operable. This could include plant shutdown. The situation would continue until Commission approval of the relief request was granted. As discussed in Section 6.3 of the NUREG, deletion of the phrase avoids situations in which compliance with an updated Code can not be achieved and an approved relief request would be needed to continue plant operation. Without this revision, relief requests could become an accelerated approval situation or result in significant impact to plant operations.

Attachment 1 provides discussion of and justification for the changes. Attachment 2 is a No Significant Hazards evaluation of the changes, and Attachment 3 is the affected pages of the WNP-2 Technical Specifications and supporting Bases reflecting the changes.

As discussed in Attachment 2, the Supply System has concluded that the changes do 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 do the changes involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed changes meet 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. The State of Washington has been provided a copy of this letter per 10 CFR 50.91.

In accordance with the recommendations of the draft NUREG, the Supply System believes that the proposed amendment is consistent with the Executive Order to reduce regulatory burden and as such is proposed as a cost beneficial line item improvement. Absent the requested change the potential for plant shutdown or reduced plant operation while a relief request is processed is possible. The cost of power during this period of reduced operation or shutdown provides justification for considering this amendment request as a cost beneficial line item improvement.

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 4.0.5, SURVEILLANCE REQUIREMENTS FOR INSERVICE INSPECTION AND TESTING PROGRAMS

With the next ISI/IST interval starting December 13, 1994 the possibility that a Code compliance and relief request issue could occur exists. In light of this possibility it is requested that this change be approved no later than December 13, 1994 to support the WNP-2 ISI/IST programs in the next ten year interval.

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
PLP/bk

cc: LJ Callan - NRC RIV
NRC Sr. Resident Inspector - 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)
)
COUNTY OF BENTON)

Subject: Request for Amend to TS 4.0.5, SRs for ISI and IST Programs

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 8 August, 1994

J. V. Parrish, Assistant Managing Director
Operations

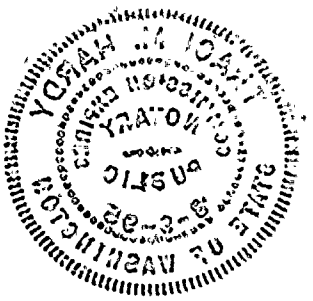
On this date personally appeared before me J. V. PARRISH, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 8th day of August 1994.

Traci M. Hardy
Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 8/9/95



REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 4.0.5, SURVEILLANCE REQUIREMENTS FOR INSERVICE INSPECTION AND TESTING PROGRAMS

DISCUSSION AND JUSTIFICATION OF CHANGE

The Supply System proposes to change Technical Specification (TS) 4.0.5.a to delete the phrase "(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR, Section 50.55a(g)(6)(i)" for the inservice inspection and testing programs (see Attachment 3). The phrase implies that without a pre-approved relief request any situation not conforming to the Code would require the equipment being tested or inspected to be declared inoperable.

A corresponding change to the Bases for sections 4.0.5 and 3/4.4.8 is also proposed. Additionally, an inspection frequency of "Biennially or every 2 years....At least once per 731 days" is added to the testing schedule in 4.0.5.b.

In situations where no relief request has been approved, compliance to the Code is impractical and the situation could not have been identified in a timely manner, the present wording of 4.0.5 would require an immediate relief request. Further, because the equipment would not satisfy the required surveillance testing (unable to conform to the requirements of the Code), it would be declared inoperable. Therefore entry into the associated Technical Specification action statement would be required. The action statement would impose compensatory action or require changing the plant operating condition. This action would be taken so that the plant would be in an operating condition in which the inoperable equipment was not required. This could lead to reduced operations or plant shutdown for the period necessary to obtain relief request approval.

As discussed in the referenced NUREG, the NRC staff recognized that situations could arise which would put the licensee in a condition that is not in strict compliance with the Technical Specification 4.0.5 requirement to comply with ASME Section XI "except where specific written relief has been granted." The NUREG recommends that licensees revise Technical Specification 4.0.5, to reflect the intent of the improved Standard Technical Specifications (ITS) [NUREG-1433/1434, BWR 4 and 6 plants] for the ISI/IST programs. The proposed change would allow continued operation in the event that an ASME Code requirement is found to be impractical because of prohibitive dose rates or limitations in the design, construction, or system configuration. A relief request would then be submitted so that operation could continue during the period in which the relief request was being reviewed by the Commission. Such a relief request would require the following review prior to submittal and implementation: (1) reviewed pursuant to 10 CFR 50.59; (2) approved by the plant staff in accordance with the administrative process described in the ISI/IST programs administrative procedures; and (3) reviewed by the Plant Operating Committee.

DISCUSSION AND JUSTIFICATION OF CHANGE (continued)

The ITS reflect the approved industry position for the ISI/IST programs as established by 10 CFR 50.55a. 10 CFR 50.55a and the ITS do not require that relief requests be granted before they are implemented. Rather, 10 CFR 50.55a(f)(5)(iv) and 10 CFR 50.55a(g)(5)(iv) allow a licensee up to a full year after the beginning of the updated interval to inform the NRC of those new Code requirements which cannot be met and to request relief. The regulations require the licensee to submit relief requests within 12 months of the interval start date, or during the interval as it finds specific needs for relief. This Technical Specification change implements the ITS position which allows continued operation based on the licensee's reviews and approval of the relief request and follows the intent of 10 CFR 50.55a.

Although, the NUREG does not specifically address the ISI program, the situation is applicable to both the ISI and IST programs. Reference to paragraph "(g)" of 10 CFR 50.55a should be deleted from Technical Specification 4.0.5.a and Bases 3/4.4.8, because by rulemakinq effective September 8, 1992 (Federal Register Vol. 57, 34666), the Nuclear Regulatory Commission established paragraph (f) to separate the IST requirements from the ISI requirements in paragraph (g) of 10 CFR 50.55a. By deleting "(g)", reference to 10 CFR 50.55a implies both "(f)" and "(g)" requirements are applicable as appropriate.

The proposed changes are justified in that the review process described above will require any Code nonconformance to be evaluated against the criteria of 10 CFR 50.59 to ensure that an unreviewed safety question has not been created. As stated in 10 CFR 50.59, changes that do not create an unreviewed safety question or a change to the Technical Specifications may be implemented without prior Commission approval. 10 CFR 50.55a allows continued operation pending satisfactory demonstration of the basis for the relief request to the Commission not later than 12 months after the expiration of the initial 120-month period of operation and each subsequent 120-month period. Hence, with a specific Code nonconformance and resulting actions satisfying the 10 CFR 50.59 criteria there is no necessity to restrict plant operation until the associated relief request has been approved by the Commission.

The addition of an inspection frequency of "Biennially or every 2 years....At least once per 731 days" to 4.0.5.b simply provides an interpretation of the ASME XI testing frequency for consistency with the remainder of Section 4.0.5.b. It is an administrative change having no technical impact.

REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 4.0.5, SURVEILLANCE REQUIREMENTS FOR INSERVICE INSPECTION AND TESTING PROGRAMS

No Significant Hazards Evaluation

A. The Supply System has evaluated deleting the phrase "(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR, Section 50.55a(g)(6)(i)" from Technical Specification 4.0.5.a and similar phrases from Bases 4.0.5 and 3/4.4.8 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 proposed amendment allows continued plant operation in situations where ISI/IST Code compliance may be impractical. Continued operation is allowed only if the Code nonconformance has been determined not to be an unreviewed safety question or require a Technical Specification change as defined by 10 CFR 50.59. Further, to support continued operation a relief request must be submitted for Commission approval in accordance with 10 CFR 50.55a.

The change being proposed is administrative in nature and does not affect assumptions contained in plant safety analyses, the physical design and/or operation of the plant, nor does it affect Technical Specifications that preserve safety analysis assumptions. Any relief from the approved ASME Section XI Code requirements, under the circumstances contemplated by NUREG-1482, will require a 10 CFR 50.59 evaluation to ensure no Technical Specification changes or unreviewed safety questions exist. Further, the required 10 CFR 50.59 review includes a determination as to "if the probability of occurrence or the consequences of an accident or malfunction of equipment important to safety previously evaluated in the safety analysis report may be increased." This evaluation will ensure that actions are not taken that could involve a significant increase in the probability or consequences of an accident previously evaluated.

For the above reasons, operation of the facility in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of previously evaluated accidents.

No Significant Hazards Evaluation (continued)

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

The proposed change is administrative in nature and will not change the physical plant or the modes of operation defined in the WNP-2 License. The change does not involve the addition or modification of equipment nor does it alter the design or operation of plant systems. Any relief requests from the approved ASME Section XI Code requirements, under the circumstances contemplated by NUREG-1482, will require a 10 CFR 50.59 evaluation to ensure no Technical Specification changes or unreviewed safety questions exist before implementation. The 10 CFR 50.59 evaluation will specifically address whether or not the "possibility for an accident or malfunction of a different type than any evaluated previously in the safety analysis report may be created."

Therefore, with the control provided by the 10 CFR 50.59 review process and the administrative nature of the change, operation of the facility in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.

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

The margin of safety established by the 4.0.5.a ISI/IST program surveillance requirements is in ensuring that the systems are operable and will perform adequately to support the assumptions of the accident analysis. The change being proposed is administrative in nature and does not alter the basis for assurance that safety-related activities are performed correctly. The change does not alter the basis for any Technical Specification that is related to the establishment of or maintenance of a safety margin. Any relief request from the approved ASME Section XI Code requirements, under the circumstances contemplated by NUREG-1482, will require a 10 CFR 50.59 evaluation to ensure that no Technical Specification changes or unreviewed safety questions exist as a result of the relief request. Further, the 10 CFR 50.59 review includes a determination as to "if the margin of safety as defined in the basis for any technical specification is reduced." This evaluation will ensure that actions are not taken that could involve a significant reduction in a margin of safety.

For these reasons, operation of the facility in accordance with the proposed amendment will not involve a significant reduction in a margin of safety.

No Significant Hazards Evaluation (continued)

B. The Supply System considers the addition of the testing schedule "Biennially or every 2 years....At least once per 731 days" to 4.0.5.b to be an administrative change having no technical impact. However, because it does represent a change to the WNP-2 Technical Specifications the following evaluation is provided to support a determination that it does not represent a significant hazards consideration.

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

Clarification of existing requirements as put forth in ASME XI for a biennial testing frequency as 731 days has no impact on the operation of the plant and does not have a credible impact on the possibility or consequences of a previously evaluated accident. The change does not result in any hardware or operating procedure changes. Hence, such a change cannot increase the probability of a previously evaluated accident. Because it does not involve any equipment modifications or operating mode changes, the consequences of an accident occurring with this change is the same as the consequences of an accident occurring without the change.

Incorporation of the change in the WNP-2 Technical Specifications will not alter the probability of a previously evaluated accident nor increase the consequences of an accident.

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

Because the proposed change introduces no new mode of plant operation nor does it require physical modification of the plant, the possibility of a new or different kind of accident than those previously evaluated is not created by this change.

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

Clarification of the ASME XI testing frequency of "Biennially or every two years....At least once per 731 days" has no impact on the operation of the plant and can not significantly impact the margin of safety created by the affected Technical Specifications. The change clarifies and improves the accuracy and understanding of the Technical Specifications. Because it does not have a technical or operational impact, the margin of safety created by the affected specification is not significantly affected by this change.

TECHNICAL SPECIFICATION PAGES

and BASES CHANGES

Incorporating the Recommendations of NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants."