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SUBJECT: Forwards amend to license NPF-21, adding RWCU sys high  
 blowdown containment isolation trip function & associated  
 LCO & SR to Tables 3.3.2.-1, 3.3.2-2 & 4.3.2.1-1.

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April 25, 1995  
GO2-95-076

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 3/4.3.2,  
"ISOLATION ACTUATION INSTRUMENTATION"

- References:
- 1) Letter GO2-93-258, dated October 25, 1993, JV Parrish (SS) to NRC, "Licensee Event Report No. 93-028-00"
  - 2) Letter GO2-93-279, dated December 3, 1993, JV Parrish (SS) to NRC, "Request for Amendment to Operating License for Exclusion of a Single Reactor Water Cleanup System High Energy Line Break"
  - 3) Letter, dated July 7, 1994, JW Clifford (NRC) to JV Parrish (SS), "Denial of Amendment to Operating License for Exclusion of a High-Energy Line Break in the Reactor Water Cleanup System for WNP-2 (TAC No. M77947)"
  - 4) Letter GO2-94-160, dated July 12, 1994, JV Parrish (SS) to NRC, "Request for Amendment to the Technical Specifications, Relocation of Technical Specification Tables for 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 amendment request proposes to add a Reactor Water Cleanup (RWCU) system high blowdown containment isolation trip function and associated Limiting Condition for Operation (LCO) and surveillance requirements to Tables 3.3.2-1, 3.3.2-2, and 4.3.2.1-1.

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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION 3/4.3.2,  
"ISOLATION ACTUATION INSTRUMENTATION"**

On September 23, 1993, the Supply System determined that a postulated high energy line break (HELB) in a 4-inch RWCU line (RWCU(5)-3-1) had not been fully analyzed. The postulated break would occur on the 501 foot floor elevation of the Reactor Building at the piping connection to the RWCU system blowdown flow control valve (RWCU-FCV-33). This is an American Society of Mechanical Engineers (ASME) Section III, Class 3, pipe to valve connection as defined in NRC Branch Technical Position MEB 3-1. The NRC requires that a line break be postulated at this location. However, the postulated line break was not previously analyzed for the effects on the Reactor Building environment. This condition was reported in Reference 1.

The Supply System has an Operability Evaluation in place to support interim plant operation with the current RWCU design. It was concluded that the current design provides an adequate level of protection since the calculated piping stresses at the postulated break location were extremely low. In addition, nondestructive examination of the subject piping was within ASME defined limits, and diverse means exist to automatically isolate the postulated RWCU line break. However, the Supply System determined that permanent acceptance of the existing RWCU design involved an unreviewed safety question (USQ). To resolve the USQ, the Supply System requested (in Reference 2) an amendment to the WNP-2 Operating License to allow a permanent exclusion of the postulated HELB at the piping connection to the RWCU flow control valve. The amendment request was subsequently denied in Reference 3. The NRC staff stated that pipe breaks at terminal ends must be postulated regardless of stress levels. Although the amendment request was denied, interim plant operation was allowed through the 1995 refueling outage.

This proposed amendment updates the Technical Specifications to include additional instrumentation to be installed to resolve the USQ for the postulated HELB in the RWCU system. In accordance with the direction received in Reference 3, a design change (BDC 94-0270-0A) will be implemented to address the postulated line break prior to restart from the Spring 1995 (R-10) Maintenance and Refueling Outage. This design change is an addition to the plant that does not require removal or modification of existing Technical Specification requirements. For the interim period between R-10 startup and amendment approval, the Supply System will incorporate operability and surveillance requirements similar to those proposed in this amendment request into the WNP-2 Licensee Controlled Specifications (LCS). The requirements could not be replicated exactly due to differences in format between the current Technical Specifications and the LCS. However, since the LCS uses the new Boiling Water Reactor (BWR) Improved Technical Specifications (NUREG-1433 and 1434) format, the capability to detect and mitigate the postulated RWCU HELB will be maintained in a manner comparable to the proposed Technical Specification requirements until the requirements are incorporated into the WNP-2 Technical Specifications.

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"ISOLATION ACTUATION INSTRUMENTATION"**

This Technical Specification amendment request is subdivided as follows:

- Attachment 1 provides a discussion and the justification for the proposed changes.
- Attachment 2 describes the Supply System's evaluation of the proposed changes in accordance with 10 CFR 50.92(c).
- Attachment 3 includes the affected pages of the Technical Specifications with the proposed changes indicated.

As discussed in Attachment 2, the Supply System has concluded that the proposed changes to the WNP-2 Technical Specifications do not involve a significant hazards consideration. In addition, as discussed herein, the proposed changes do not create a potential for a significant change in the types or a 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 changes meet the eligibility criteria for a categorical exclusion as set forth in 10 CFR 51.22(c)(9). Therefore, in accordance with 10 CFR 51.22(b), an environmental assessment of the changes is not required.

This Technical Specification amendment 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.

Should you have any questions or desire additional information regarding this matter, please call me or Mr. D.A. Swank at (509) 377-4563.

Sincerely,



J.W. Parrish (Mail Drop 1023)  
Vice-President, Nuclear Operations

CDM/  
Attachments

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