

**ATTACHMENT 1**

**Proposed Change to Section 6.9.3.2 of the WNP-2 Technical Specification**

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## ADMINISTRATIVE CONTROLS

### CORE OPERATING LIMITS REPORT (Continued)

6.9.3.2 The analytical methods used to determine the core operating limits shall be those topical reports and those revisions and/or supplements of the topical report previously reviewed and approved by the NRC, which describe the methodology applicable to the current cycle. For WNP-2 the topical reports are:

1. ANF-1125(P)(A), and Supplements 1 and 2, "ANFB Critical Power Correlation," April 1990
2. Letter, R. C. Jones (NRC) to R. A. Copeland (ANF), "NRC Approval of ANFB Additive Constants for ANF 9x9-9X BWR Fuel," dated November 14, 1990
3. ANF-NF-524(P)(A), Revision 2 and Supplements 1 and 2, "Advanced Nuclear Fuels Corporation Critical Power Methodology for Boiling Water Reactors," November 1990
4. ANF-913(P)(A), Volume 1, Revision 1 and Volume 1, Supplements 2, 3 and 4, "COTRANSA 2: A Computer Program for Boiling Water Reactor Transient Analysis," August 1990
5. ANF-CC-33(P)(A), Supplement 2, "HUXY: A Generalized Multirod Heatup Code with 10 CFR 50, Appendix K Heatup Option," January 1991
6. XN-NF-80-19(P)(A), Volume 1, Supplements 3 and 4, "Advanced Nuclear Fuel Methodology for Boiling Water Reactors," November 1990
7. XN-NF-80-19(P)(A), Volume 4, Revision 1, "Exxon Nuclear Methodology Boiling Water Reactors: Application of the ENC Methodology to BWR Reloads," June 1986
8. XN-NF-80-19(P)(A), Volume 3, Revision 2, "Exxon Nuclear Methodology for Boiling Water Reactors THERMEX: Thermal Limits Methodology Summary Description," January 1987
9. XN-NF-85-67(P)(A), Revision 1, "Generic Mechanical Design for Exxon Nuclear Jet Pump BWR Reload Fuel," September 1986
10. ANF-89-014(P)(A), Revision 1 and Supplements 1 and 2, "Advanced Nuclear Fuels Corporation Generic Mechanical Design for Advanced Nuclear Fuels Corporation 9x9-IX and 9x9-9X BWR Reload Fuel," October 1991
11. XN-NF-81-22(P)(A), "Generic Statistical Uncertainty Analysis Methodology," November 1983
12. NEDE-24011-P-A-10-US, "General Electric Standard Application for Reactor Fuel," U.S. Supplement, March 1991
13. NEDE-23785-1-PA, Revision 1, "The GESTR-LOCA and SAFER Models for the Evaluation of the Loss-of-Coolant Accident, Volume III, SAFER/GESTR Application Methodology," October 1984
14. NEDO-20566A, "General Electric Company Analytical Model for Loss-of-Coolant Analysis in Accordance with 10 CFR 50 Appendix K," September 1986
15. EMF-CC-074(P)(A), "Volume 1 -- STAIF - A Computer Program for BWR Stability in the Frequency Domain, Volume 2 -- STAIF A Computer Program for BWR Stability in the Frequency Domain, Code Qualification Report," July 1994.

NEW  
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16. WPPSS-FTS-127(A), Qualification of Core Physics Methods for BWR Design and Analysis", November 1994
17. WPPSS-FTS-129(A), Revision 1, "BWR Transient Analysis Model", November 1994
18. WPPSS-FTS-131(A), Revision 1, "Applications Topical Report for BWR Design and Analysis", November 1994

## ATTACHMENT 2

### No Significant Hazards Consideration Determination

In accordance with the criteria for a significant hazards consideration established in 10 CFR 50.92, the Supply System has evaluated the proposed amendment to the WNP-2 Technical Specifications and determined that it does not represent a significant hazards consideration. The following discussion is provided in support of this conclusion.

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

The proposed amendment does not remove or modify existing Technical Specification requirements or safety limits. The Technical Specifications will continue to require operation within analyzed core operating limits and appropriate actions be taken when, or if, limits are exceeded. There will be no changes to the physical design of the plant as a result of adding the proposed references to Section 6.9.3.2. The results of analytical determination of core operating limitations is not assumed as the initiator of any analyzed event, and the approved safety analysis is still applicable. Therefore, the proposed amendment to Technical Specification 6.9.3.2 does not involve a significant increase in the probability or consequences of an accident previously evaluated.

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

The proposed amendment does not remove or modify existing Technical Specification requirements or safety limits. The Technical Specifications will continue to require operation within analyzed core operating limits and appropriate actions be taken when, or if, such limits are exceeded. The technical methodology outlined in the three new reports is in accordance with accepted principals, and the specific reports proposed for inclusion in the Technical Specifications by this request have been previously approved by NRC for use at WNP-2 as a basis for core reload analyses. Therefore, the proposed amendment to Technical Specification 6.9.3.2 does not create the possibility of a new or different type of accident from any accident previously evaluated.

3. Does the amendment involve a significant reduction in a margin of safety?

Plant safety limits are established through LCOs, limiting safety system settings, and safety limits specified in the Technical Specifications. There will be no changes to either the physical design of the plant or to any of these settings and limits as a result of adding the proposed references to Section 6.9.3.2. The ability to mitigate the consequences of all accidents previously evaluated will be maintained and nuclear safety is not adversely affected because the technical methodology outlined in the three new reports is in accordance with accepted principals, and the specific reports proposed for inclusion in the Technical Specifications by this request have been previously approved by NRC for use at WNP-2 as a basis for core reload analyses. Therefore, the proposed amendment to Technical Specification 6.9.3.2 does not significantly reduce any margin of safety.

