

CATEGORY 1

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SUBJECT: Application for amend to License NPF-21, revising containment leakage testing.

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March 19, 1996
GO2-96-060

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
Washington D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
REVISION TO REQUEST FOR AMENDMENT TO OPERATING
LICENSE NPF-21: CONTAINMENT LEAKAGE TESTING**

- References:
- 1) Letter, dated January 19, 1996, JV Parrish (SS) to Nuclear Regulatory Commission, "Request For Amendment To Operating License NPF-21, Primary Containment Leakage Testing."
 - 2) Telecon, dated February 28, 1996, JW Clifford (NRC), RM Lobel (NRC), LC Fernandez (SS) et al.
 - 3) Letter, dated November 2, 1995, CI Grimes (NRC) to DJ Modeen (NEI), Regarding Appendix J Implementation.
 - 4) Regulatory Guide 1.163 dated September 1995, "Performance-Based Containment Leak-Test Program."

In accordance with the Code of Federal Regulations, Title 10, Parts 2.101 and 50.90, the Supply System hereby submits revisions to the pending Reference 1 request for amendment to Operating License NPF-21 pursuant to the Reference 2 telecon. A description of the proposed revisions and bases for our determination that they are acceptable is included in Attachment 1.

For ease of review, the entire set of marked-up pages included in Reference 1 are included in Attachment 2 of this letter. However, the suggested revisions pertain only to two of the four pages (3/4 6-4 and 6-15b) and are clearly identified as proposed revisions. As discussed at the Reference 2 telecon, the Basis For No Significant Hazards Consideration Determination included in Reference 1 covers this action because these revisions do not substantially modify the pending request.

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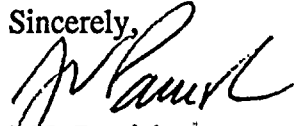
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**REVISION TO REQUEST FOR AMENDMENT TO OPERATING LICENSE NPF-21:
CONTAINMENT LEAKAGE TESTING**

Should you have any questions or desire additional information, please call me or Mr. Dave Swank at (509)-377-4563.

Sincerely,



J.W. Parrish
Chief Executive Officer
(Mail Drop 1023)

Attachments

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 - 927N
FS Adair - EFSEC

ATTACHMENT 1

The pending request to amend operating license NPF-21, submitted by Reference 1, would change the WNP-2 Technical Specifications to allow use of Option B in Appendix J to 10 CFR Part 50 in performing primary containment leak rate testing activities. Two revisions to the pending request are being proposed in response to the Reference 2 telecon.

Proposed Revision No. 1

In the pending request, the first paragraph of proposed administrative section 6.8.4.f is worded as follows:

“A program shall be established to implement the leakage testing for the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J. This program shall be in accordance with the guidelines of Regulatory Guide 1.163, Revision 0, “Performance-Based Containment Leak-Test Program, as modified by approved exemptions and the following exceptions:”

Pursuant to the Reference 2 telecon, it is proposed to replace that wording with the following, with no other changes to the remainder of section 6.8.4.f:

“A program shall be established to implement the leakage rate testing for the primary containment as required by 10 CFR 50.54(o) and 10 CFR 50 Appendix J Option B, as modified by approved exemptions. This program shall be in accordance with the guidelines of Regulatory Guide 1.163, dated September 1995, “Performance-Based Containment Leak-Test Program, as modified by the following exceptions:”

The revisions conform the wording of this paragraph to the guidance included in Reference 3, and are acceptable because they do not alter the intent or substance of the originally proposed wording, and adopt wording suggested by the NRC as an industry standard.

Proposed Revision No 2

In the pending request, surveillance requirement 4.6.1.2.f is worded as follows:

“f. Main steam line isolation valves shall be leak tested at least once per 30 months.”

Pursuant to the Reference 2 telecon, it is proposed to replace that wording with the following, with no other changes to the remainder of section 4.6.1.2:

“f. Deleted”

Deletion of Surveillance Requirement 4.6.1.2.f, would leave Surveillance Requirement 4.6.1.2 as the governing requirement for all leak rate testing, as follows::

“4.6.1.2 Perform required primary containment leakage rate testing in accordance with the Primary Containment Leakage Rate Testing Program described in Specification 6.8.4.f.”

As discussed in the Reference 2 telecon, the wording of section 4.6.1.2.f in the pending request is acceptable but unnecessary because Position C.2 of Regulatory Guide 1.163 (Reference 4) explicitly establishes 30 months as the baseline testing frequency for main steam line isolation valves, with consideration of operating experience and safety significance. Therefore, the proposed revision is acceptable because it does not alter the intent or substance of the originally proposed wording, and is consistent with explicit guidance in Regulatory Guide 1.163.

ATTACHMENT 2

Revisions to Proposed Amendments To WNP-2 Technical Specifications

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