

CATEGORY 1

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9609180032* DOC. DATE: 96/09/06 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME AUTHOR AFFILIATION
 SWANK, D.A. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 Document Control Branch (Document Control Desk) *Change to TS*

SUBJECT: Provides addl info on draft SER of proposed improved TS.

DISTRIBUTION CODE: A001D COPIES RECEIVED: LTR 1 ENCL 1 SIZE: 114 + 375
 TITLE: OR Submittal: General Distribution

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTTR ENCL
	PD4-2 LA	1 1	PD4-2 PD	1 1
	COLBURN, T	1 1		
INTERNAL:	ACRS	1 1	<u>FILE CENTER 01</u>	1 1
	NRR/DE/EMCB	1 1	NRR/DRCH/HICB	1 1
	NRR/DSSA/SPLB	1 1	NRR/DSSA/SRXB	1 1
	NUDOCS-ABSTRACT	1 1	OGC/HDS3	1 0
EXTERNAL:	NOAC	1 1	NRC PDR	1 1

NOTE TO ALL "RIDS" RECIPIENTS:
 PLEASE HELP US TO REDUCE WASTE! CONTACT THE DOCUMENT CONTROL DESK,
 ROOM OWFN 5D-5 (EXT. 415-2083) TO ELIMINATE YOUR NAME FROM
 DISTRIBUTION LISTS FOR DOCUMENTS YOU DON'T NEED!

TOTAL NUMBER OF COPIES REQUIRED: LTTR 13 ENCL 12

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

September 6, 1996

GO2-96-177

Docket No. 50-397

U.S. Nuclear Regulatory Commission

Attn: Document Control Desk

Washington, D.C. 20555

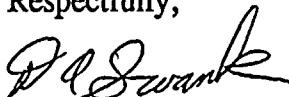
Gentlemen:

**Subject: WNP-2, OPERATING LICENSE NPF-21
ADDITIONAL INFORMATION ON DRAFT SAFETY EVALUATION OF
PROPOSED IMPROVED TECHNICAL SPECIFICATIONS**

- References:
- 1) Letter, GI2-96-189 dated July 26, 1996, TV Wambach (NRC) to JV Parrish (SS), "Draft Safety Evaluation of Proposed Improved Technical Specifications, Washington Public Power Supply System Nuclear Project No. 2 (TAC No. M94226)"
 - 2) Letter, GO2-96-172 dated August 30, 1996, PR Bemis (SS) to U.S. Nuclear Regulatory Commission, "Comments on Draft Safety Evaluation of Proposed Improved Technical Specifications"

Reference 1 transmitted the draft safety evaluation (SE) of the Supply System's proposed conversion to the Improved Technical Specifications. Reference 2 provided specific comments on the SE. The attachment to this letter is a markup of the draft SE containing corrections to factual statements and proposed information to clarify evaluations. Should you have any questions or desire additional information please contact me or Ms. M. G. Eades at (509) 377-4277.

Respectfully,



D. A. Swank

Manager, Regulatory Affairs

Mail Drop PE20

Attachment

150023

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
NS Reynolds - Winston & Strawn (w/o)
TG Colburn - NRR

FS Adair - EFSEC
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N
TV Wambach - NRR

9609180032 960906
PDR ADCK 05000397
P PDR

ADD 11/



...9609180032

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

DRAFT

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. ## TO FACILITY OPERATING LICENSE NPF-###
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
WASHINGTON PUBLIC POWER SUPPLY SYSTEM NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397

I INTRODUCTION

Washington Public Power Supply System Nuclear Project No. 2 (WNP-2) has been operating with technical specifications (TS) issued with the original operating license on December 20, 1983, as amended from time to time. By letter dated December 8, 1995, as supplemented by letters dated July 9 and [REDACTED], 1996, Washington Public Power Supply System (the licensee) proposed to amend Appendix A of Operating License No. NPF-21 to revise, in their entirety, the WNP-2 TS. The proposed amendment was based on NUREG-1434, "Standard Technical Specifications, General Electric, BWR/6 Plants," Revision 1, dated April 1995, and on guidance in the "NRC Final Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (Final Policy Statement), published on July 22, 1993 (58 FR 39132). The overall objective of the proposed amendment, consistent with the Final Policy Statement, was to completely rewrite, reformat, and streamline the existing TS for WNP-2.

Hereinafter, this safety evaluation refers to the proposed TS as the "ITS" (improved TS), the existing WNP-2 TS as the "CTS" (current TS) and the TS in NUREG-1434 as the "STS" (standard TS). The safety evaluation refers to the associated TS Bases as the ITS Bases, CTS Bases, and STS Bases, respectively.

In addition to basing its ITS on the STS and the Final Policy Statement, the licensee retained portions of the CTS as a basis for the ITS. Plant-specific issues, including plant-specific design features, plant-specific requirements, and plant-specific operating practices were discussed with the licensee during a series of conference calls and meetings concluding on June 27, 1996. Based on these discussions the licensee revised their proposed changes by submittals dated July 9 and [REDACTED], 1996. In addition, the licensee proposed matters of a generic nature that were not in the STS. The NRC staff requested that the licensee submit such generic issues as a proposed change to the STS through the Nuclear Energy Institutes Technical Specifications Task Force (TSTF). These generic issues were considered for specific applications in the WNP-2 ITS. Consistent with the Final Policy Statement, the licensee proposed transferring some CTS requirements to licensee-controlled documents. In addition, human factors principles were emphasized to add clarity and understanding to the CTS requirements being retained in the ITS and to define more clearly the appropriate scope of the ITS. Further, significant changes

were proposed to the CTS Bases to make each ITS requirement clearer and easier to understand.

In addition to the original December 8, 1995, submittal, the staff has approved a number of other proposed changes to the WNP-2 TS, listed below. The staff's review of these TS changes was independent of the ITS review effort. These previous TS changes are reflected, as appropriate, in the ITS. This safety evaluation describes only those TS changes which affected implementing the ITS. The following WNP-2 operating license amendments have been issued since the December 8, 1995, submittal, on the dates indicated:

- 05/08/96 Adoption of Option B to Appendix J to 10 CFR 50. Performance based surveillance requirements for Containment testing. (Amendment No. 144)
- 06/03/96 Technical Specification Changes for adjustable speed drives for reactor recirculation pumps and digital feedwater control (Amendment No. 145)
- 06/04/96 Technical Specification Changes for reload codes for new fuel vendor (Amendment No. 146)

Technical Specification Changes for Reactor Water Clean-up System
High Energy Line Break (Amendment No.)

Technical Specification Changes for Administrative Controls
(Amendment No.)

The Commission's proposed action on the WNP-2 application for an amendment dated December 8, 1995 was published in the FEDERAL REGISTER on June 26, 1996 (61 FR 33144). Supplements to the licensee's ITS proposal, submitted by letters dated July 9 and [REDACTED], 1996, that resulted from discussions with the licensee during the staff's review, are incorporated in this safety evaluation. These plant-specific changes serve to clarify the ITS with respect to the guidance in the Final Policy Statement and the STS. Therefore, the changes are within the scope of the action described in the initial FEDERAL REGISTER notice.

During its review, the NRC staff relied on the Final Policy Statement and on the STS as guidance for acceptance of changes to the CTS. This safety evaluation documents the basis for the staff's conclusion that WNP-2 can develop ITS based on the STS, as modified by plant-specific changes, and that the use of the ITS is acceptable for continued operation. The staff also acknowledges that, in accordance with the Final Policy Statement, the conversion to the STS is a voluntary process. Therefore, the ITS differs somewhat from the STS, reflecting the current licensing basis. The staff has described the changes to the CTS and has explained the significant changes in this safety evaluation.

For the reasons stated *infra* in this safety evaluation, the staff finds that the TS issued with this license amendment complies with Section 182a of the

Atomic Energy Act, 10 CFR 50.36, and the guidance in the Final Policy Statement, and that they are in accord with the common defense and security and provide adequate protection to the public health and safety.

II BACKGROUND

Section 182a of the Atomic Energy Act requires that applicants for nuclear power plant operating licenses shall state:

[S]uch technical specifications, including information of the amount, kind, and source of special nuclear material required, the place of the use, the specific characteristics of the facility, and such other information as the Commission may, by rule or regulation, deem necessary in order to enable it to find that the utilization . . . of special nuclear material will be in accord with the common defense and security and will provide adequate protection to the health and safety of the public. Such technical specifications shall be a part of any license issued.

In 10 CFR 50.36, the Commission established its regulatory requirements related to the content of TS. In doing so, the Commission placed emphasis on those matters related to the prevention of accidents and the mitigation of accident consequences; the Commission noted that applicants were expected to incorporate into their TS "those items that are directly related to maintaining the integrity of the physical barriers designed to contain radioactivity." Statement of Consideration, "Technical Specifications for Facility Licenses; Safety Analysis Reports," 33 FR 18610 (December 17, 1968). Pursuant to 10 CFR 50.36, TS are required to include items in the following five specific categories: (1) safety limits, limiting safety system settings and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls.

For several years, NRC and industry representatives have sought to develop guidelines for improving the content and quality of nuclear power plant TS. On February 6, 1987, the Commission issued an interim policy statement on TS improvements, "Interim Policy Statement on Technical Specification Improvements for Nuclear Power Reactors" (52 FR 3788). During the period from 1989 to 1992, the utility Owners Groups and the NRC staff developed improved standard technical specifications that would establish models of the Commission's policy for each primary reactor type. In addition, the staff, licensees, and Owners Groups developed generic administrative and editorial guidelines in the form of a "Writers Guide" for preparing technical specifications, which gives greater consideration to human factors principles and was used throughout the development of licensee-specific ITS.

In September 1992, the Commission issued the improved STS (with associated STS Bases) as Revision 0 of NUREG-1433 and NUREG-1434, which were developed utilizing the guidance and criteria in the Commission's interim policy statement. Incorporating changes made in accordance with the improved STS generic change process, the Commission issued Revision 1 to the STS in April 1995. The STS were established as models for developing ITS for the BWR

plants in general and for the WNP-2 ITS specifically. The STS and associated Bases reflect the results of a detailed review of the application of the criteria in the Policy Statement to generic system functions. These results were published in a "split report" issued to the nuclear steam supply system (NSSS) Owners Groups in May 1988. The STS also reflect the results of extensive discussions on various drafts of improved standard technical specifications to ensure that the application of the TS criteria and the Writers Guide would consistently reflect detailed system configurations and operating characteristics for all NSSS designs. Accordingly, the STS Bases offer an abundance of generic information regarding the extent to which the STS present requirements which are necessary to protect the public health and safety.

On July 22, 1993, the Commission issued its Final Policy Statement, expressing its view that conforming to the guidance in the Final Policy Statement also complies with Section 182a of the Atomic Energy Act and 10 CFR 50.36. The Final Policy Statement described the safety benefits of the STS and encouraged licensees to use the STS as the basis for plant-specific TS amendments, and for complete conversions to the STS. Further, the Final Policy Statement gave guidance for evaluating the required scope of the TS and defined the guidance criteria to be used in determining which of the limiting conditions for operation (LCOs) and associated surveillances should remain in the TS. The Commission noted (58 FR 39132) that, in allowing certain items to be relocated to licensee-controlled documents while requiring that other items be retained in the TS, it was adopting the qualitative standard enunciated by the Atomic Safety and Licensing Appeal Board in *Portland General Electric Co.* (Trojan Nuclear Plant), ALAB-531, 9 NRC 263, 273 (1979). There, the Appeal Board observed:

[T]here is neither a statutory nor a regulatory requirement that every operational detail set forth in an applicant's safety analysis report (or equivalent) be subject to a technical specification, to be included in the license as an absolute condition of operation which is legally binding upon the licensee unless and until changed with specific Commission approval. Rather, as best we can discern it, the contemplation of both the Act and the regulations is that technical specifications are to be reserved for those matters as to which the imposition of rigid conditions or limitations upon reactor operation is deemed necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety.

In accordance with this approach, existing LCO requirements that fall within or satisfy any of the criteria in the Final Policy Statement should be retained in the TS; those LCO requirements that do not fall within or satisfy these criteria may be relocated to licensee-controlled documents. The Commission codified the four criteria in 10 CFR 50.36 (60 FR 36593, July 19, 1995). The Final Policy Statement criteria are as follows:

Criterion 1

Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

Criterion 2

A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 3

A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

Criterion 4

A structure, system, or component which operating experience or probabilistic safety assessment has shown to be significant to public health and safety.

Part III of this safety evaluation explains the staff's conclusion that the conversion of the WNP-2 CTS to those based on the STS, as modified by plant-specific changes, is consistent with the WNP-2 current licensing basis and the requirements and guidance of the Final Policy Statement and 10 CFR 50.36.

III EVALUATION

Evaluation Format

The following material explains the organization of the staff's evaluation of the proposed ITS, defines the four categories of changes to the CTS, and presents an evaluation of the adequacy of existing regulatory requirements for controlling future changes to requirements removed from the CTS and placed in licensee-controlled documents. It also discusses the staff's plans for monitoring the licensee's implementation of these controls at WNP-2.

ITS Chapters 1.0, 2.0, 4.0, and 5.0 are evaluated in corresponding Sections 1.0, 2.0, 4.0, and 5.0 of this safety evaluation; ITS Chapter 3.0 is evaluated in corresponding Sections 3.0 through 3.10. Each of these sections of the safety evaluation contain one or more of the following five subsections, as appropriate: (1) administrative changes, (2) less restrictive requirements, (3) more restrictive requirements, (4) STS differences, and (5) relocated specifications. Individual changes (or differences) are discussed in conjunction with the presentation of specifications in the ITS.

Administrative, i.e., non technical changes in the presentation of existing requirements;

Less restrictive requirements, i.e., relaxation or deletion of existing TS requirements, and movement of information and requirements from existing specifications (that are otherwise being retained) to licensee-controlled documents;

More restrictive requirements, i.e., new or additional ~~CTS~~ requirements;

STS differences, i.e., retention of existing requirement based on plant-specific design or current licensing basis;

Relocated specifications (from CTS Chapter 3/4.0 only), i.e., relaxations in which whole specifications (the LCO and associated action and surveillance requirements) are removed from the existing TS (an NRC-controlled document) and placed in licensee-controlled documents.

These general categories of changes to the licensee's existing TS requirements and STS differences may be better understood as follows.

Administrative Changes

Administrative (non-technical) changes are intended to incorporate human factors principles into the form and structure of the ITS so that plant operations personnel can use them more easily. These changes are editorial in nature or involve the reorganization or reformatting of CTS requirements without affecting technical content or operational restrictions. Every section of the ITS reflects this type of change. In order to ensure consistency, the NRC staff and the licensee have used the STS as guidance to reformat and make other administrative changes. Among the changes proposed by the licensee are:

- (1) providing the appropriate numbers, etc., for STS bracketed information (information that must be supplied on a plant-specific basis and that may change from plant to plant)
- (2) identifying plant-specific wording for system names, etc.
- (3) changing the wording of specification titles in the STS to conform to existing WNP-2 practices
- (4) splitting up requirements currently grouped under a single current specification to more appropriate locations in two or more specifications of the ITS
- (5) combining related requirements currently presented in separate specifications of the CTS into a single specification of the ITS

The staff reviewed all of the administrative and editorial changes proposed by the licensee and finds them acceptable, since they are compatible with the Writers Guide and the STS and are consistent with the Commission's regulations. The more significant administrative changes are discussed individually in this safety evaluation.

Less Restrictive Requirements

Less restrictive requirements are justified on a case-by-case basis in this safety evaluation. When requirements have been shown to give little or no safety benefit, their removal from the TS may be appropriate. In most cases, relaxations previously granted to individual plants on a plant-specific basis were the result of (1) generic NRC actions, (2) new staff positions that have evolved from technological advancements and operating experience, or (3) resolution of the Owners Groups comments on the STS. The NRC staff reviewed generic relaxations contained in the STS and found them acceptable because they are consistent with current licensing practices and the Commission's regulations. The WNP-2 design was also reviewed to determine if the specific design basis and licensing basis are consistent with the technical basis for the model requirements in the STS, and thus provide a basis for the ITS.

The licensee also proposed changes to the CTS that were not related to the conversion process, but were based on plant-specific considerations and requirements. These proposed changes are discussed in the appropriate sections of this safety evaluation, along with the conversion issues.

A significant number of changes to the CTS involved the removal of specific requirements and detailed information that can be adequately maintained in licensee-controlled documents by applicable regulatory requirements. Such changes have been made to retained specifications that contained specific requirements and detailed information of the following general types:

- Type 1 Details of system design
- Type 2 Procedural details for system operation
- Type 3 Procedural details for performing action and surveillance requirements
- Type 4 Performance requirements for indication-only instrumentation and alarms
- Type 5 Post-maintenance testing requirements
- Type 6 Preventive maintenance requirements
- Type 7 Conditions comprising the OPERABILITY of a system
- Type 8 CTS requirements redundant to retained CTS requirements
- Type 9 CTS requirements redundant to applicable regulatory requirements

The staff has concluded that these types of detailed information and specific requirements are not necessary to ensure the effectiveness of the ITS to adequately protect the health and safety of the public. Accordingly, these requirements may either be deleted, if appropriate, or moved to one of the

following licensee-controlled documents for which changes are adequately governed by a regulatory or TS requirement: (1) TS Bases controlled by ITS 5.5.10 "Technical Specifications Bases Control Program;" (2) FSAR (includes the Licensee Controlled Specifications (LCS) by reference) controlled by 10 CFR 50.59; and (3) operational, emergency, and maintenance procedures, identified by FSAR reference in Enclosure 4 to the submittal dated July 9, 1996 (G02-96-132) and therefore also controlled by 10 CFR 50.59.

Table 1 lists the changes involving each of the nine types of specific requirements or information that have been removed or deleted. If additional explanation of the rationale for a particular change was judged appropriate, the staff included a specific discussion of the change in the appropriate Subsection of Part III of this safety evaluation. For each of these changes, Table 1 also lists the licensee-controlled documents and the TS or regulatory requirements governing changes to those documents.

The following discussions address why each of the nine types of information or specific requirements do not need to be included in the ITS.

(1) Details of System Design The design of the facility is required to be described in the FSAR by 10 CFR 50.34. In addition, the quality assurance (QA) requirements of Appendix B to 10 CFR Part 50 require that plant design be documented in controlled procedures and drawings, and maintained in accordance with an NRC-approved QA plan (FSAR Chapter 17). In 10 CFR 50.59 controls are specified for changing the facility as described in the FSAR and in 10 CFR 50.54(a) criteria are specified for changing the QA plan. In the ITS, the Bases also contain descriptions of system design. ITS 5.5.10 specifies controls for changing the Bases. Removing details of system design from the CTS is acceptable because this information will be adequately controlled in the FSAR, controlled design documents and drawings, or the TS Bases, as appropriate.

(2) Procedural Requirements for System Operation The plans for the normal and emergency operation of the facility are required to be described in the FSAR by 10 CFR 50.34. ITS 5.4.1.a requires written procedures to be established, implemented, and maintained for plant operating procedures including procedures recommended in Regulatory Guide 1.33, Revision 2, Appendix A, February 1978. Controls specified in 10 CFR 50.59 apply to changes in procedures as described in the FSAR. In the ITS, the Bases also contain descriptions of system operation. It is acceptable to remove details of system operation from the TS because this type of information will be adequately controlled in the FSAR, plant operating procedures, and the TS Bases, as appropriate.

(3) Procedural Details for Performing Action and Surveillance Requirements Details for performing action and surveillances requirements are more appropriately specified in the plant procedures required by ITS 5.4.1, the FSAR, and the ITS Bases. For example, control of the plant conditions appropriate to perform a surveillance test is an issue for procedures and scheduling and has previously been determined to be unnecessary as a TS restriction. As indicated in Generic Letter 91-04, allowing this control is consistent with the vast majority of other surveillance requirements that do

not dictate plant conditions for surveillances. Prescriptive procedural information in an action requirement is unlikely to contain all procedural considerations necessary for the plant operators to complete the actions required. Such information in the TS could distract the plant operators from focusing on applying the appropriate plant operational or emergency procedure to accomplish the action requirement. Thus, removal of such information from the TS is potentially beneficial to safe operation of the plant during compliance with a TS action statement. In addition to the potential safety benefit, the removal of these kinds of procedural details from the CTS is acceptable because they will be adequately controlled in the FSAR, plant procedures, and the Bases, as appropriate.

(4) Performance Requirements for Indication-Only Instrumentation and Alarms Indication-only instrumentation, test equipment, and alarms are usually not required to be operable to support TS operability of a system or component. Thus, the STS generally contain no operability requirements for indication-only equipment. The availability of such indication instruments, monitoring instruments, and alarms, and necessary compensatory activities if they are not available, are more appropriately specified in plant operational, maintenance, and annunciator response procedures required by ITS 5.4.1. Removal of requirements for indication-only instrumentation and alarms from the CTS is acceptable because they will be adequately controlled in plant procedures.

(5) Post-Maintenance Testing Requirements Any time the operability of a TS-required component or system has been affected by maintenance (e.g., repair or replacement of a component), appropriate post-maintenance tests must be performed to demonstrate operability of the system or component. For some TS-required components and systems, the CTS contain specific post-maintenance surveillance requirements. In the ITS, all surveillance requirements associated with a TS-required component or system must be met to consider the component or system operable. This means that appropriate testing following maintenance must include satisfying the surveillance requirements in order to return the affected equipment to an operable status. Deletion of the post-maintenance surveillance requirements contained in the CTS is acceptable because they are not necessary to ensure the performance of appropriate testing following maintenance on TS-required equipment.

(6) Preventive Maintenance Requirements Generally, the STS include surveillance requirements that directly relate to system operability. However, preventive maintenance surveillances, contained in the CTS do not directly demonstrate system or component operability. Removal of these requirements from the CTS is acceptable because they will be adequately controlled in plant maintenance procedures required by ITS 5.4.1. Based on the licensee's commitment to control changes to these procedures under the provisions of 10 CFR 50.59, these preventive maintenance requirements will be properly maintained. Similarly, surveillances that are duplicative of the inservice testing (IST) requirements of 10 CFR 50.55a and ITS 5.5.8 are within the scope of preventive maintenance. It is acceptable to remove these duplicative requirements from the CTS because the procedures that implement the IST program must be consistent with 10 CFR 50.55a and ITS 5.5.8.

(7) Conditions Comprising the OPERABILITY of a System For a system to be operable the TS definition of operability as it pertains to the system must be satisfied, and the specified surveillance requirements associated with the LCO governing the system must be met. Some existing LCOs contain information about design and configuration, implying that they relate to meeting the operability requirements of the LCO. Such information is usually incomplete and is actually redundant to the operability definition and the associated surveillances. Removal of this information from the CTS is acceptable because it will be adequately controlled in the FSAR, the LCS, and the TS Bases, as appropriate. In addition, because the operability requirements for the affected systems and supporting surveillances are being retained in the ITS, removal of this information does not impact safety.

(8) CTS Requirements Redundant to Retained CTS Requirements Existing specifications that have not been retained as separate specifications in the ITS may contain requirements that are redundant to other TS requirements. Such redundant requirements have been deleted. Such changes are essentially administrative in nature but have been characterized as less restrictive because information has been removed from the TS. Thus, this type of changes has no impact on safety. Therefore, deletion of Type 8 requirements is acceptable. (Note that the ITS locations of the retained requirements from these existing specifications are treated in the discussions of administrative changes.)

(9) CTS Requirements Redundant to Regulations CTS requirements that are redundant to requirements contained in the Code of Federal Regulations have been deleted from the CTS, and will be verified to be contained in the plant procedures and programs that implement those regulations. Deletion of these requirements is appropriate because where conflict exists between a TS requirement and a more-restrictive regulation, the regulation has precedence. Deleting the redundant TS requirements does not impact safety because the limiting level of regulatory requirements are not reduced. Therefore, deletion of Type 9 requirements is acceptable.

These nine general types of CTS requirements that have been moved to licensee-controlled documents are not required by 10 CFR 50.36 to be in the TS. For the reasons presented above, such information and requirements are not required to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety. Further, where such information and requirements are contained in limiting conditions for operation and associated requirements in the CTS, the staff has concluded that they do not fall within any of the four criteria in the Final Policy Statement (discussed in Part II of this safety evaluation). In addition, the staff has found that sufficient regulatory controls exist in 10 CFR 50.59 and in other regulations cited herein, and in ITS 5.5.10, "TS Bases Control Program." Accordingly, existing detailed information and specific requirements, such as generally described above, may be removed from CTS and placed in appropriate licensee-controlled documents, or deleted, as appropriate.

Changes in Surveillance Frequencies from 18-months to 24-months In addition, the licensee proposed changing the frequency of the 18-month surveillances to 24 months to accommodate a change to the WNP-2 maintenance cycle from 12

months to 24 months. Currently, most of the surveillances that are required to be performed on an 18-month interval are performed annually because they must be performed while the plant is shut down. Because of seasonal conditions in the northwest, WNP-2 is shut down every spring for an annual maintenance and refueling outage. This has necessitated more frequent testing resulting in increased costs, wear on equipment, and personnel radiation exposure.

In Generic Letter 94-01, the NRC advised all licensees moving to a 24-month fuel cycle that extending the 18-month surveillance intervals to 24 months could be justified on the basis of a successful equipment performance history. Although the motivation for the surveillance interval extension proposed for WNP-2 is different from that addressed in the generic letter (to accommodate a 24-month maintenance cycle instead of a 24-month fuel cycle), the technical basis for the extension is the same. That technical basis consists of successful equipment performance history exhibited by an evaluation of the results of surveillance tests, corrective and preventive maintenance, and operating history for the affected equipment and systems. In its submittal, Attachment 2 to the letter dated July 9, 1996 (Evaluation of the 24 month surveillance interval), the licensee described its review of the test, maintenance, and operating history of all systems at WNP-2 that have surveillance requirements that would be affected by the extension. This included test data from 1990 through 1995, equipment history from maintenance rule scoping and performance criteria documents, licensee event reports, and the plant tracking log. Most 18-month surveillance test failures occurred toward the beginning of the review period; recent testing and equipment reliability have been satisfactory. In addition, except in one instance, all test failures would likely have been detected by other surveillances that are performed more frequently. The one exception resulted from a procedural adherence problem, not equipment malfunction. All negative equipment performance history is provided in the "Evaluation of the 24 month surveillance interval."

Based on its determination that the maintenance, testing, and performance history of the affected systems and equipment is satisfactory, the assumptions in the plant licensing basis would not be invalidated by performing any surveillance at the bounding surveillance interval limit of 30 months (1.25 times 24 months) permitted by ITS SR 3.0.2. Thus, the effect of this change does not degrade equipment reliability or the safe operation of the plant. Therefore, the staff finds that extending the 18-month surveillance intervals to 24-months is acceptable. Additional considerations supporting this change for instrumentation surveillances are presented in Section 3.3.b of Part III of this safety evaluation. Each surveillance to which this change applies is described in the appropriate section of this safety evaluation.

More Restrictive Requirements

The ITS contain certain more restrictive requirements than the CTS. These requirements are either more conservative than corresponding requirements in the CTS or have additional restrictions that are not in the CTS but are in the STS. Examples of more restrictive requirements are placing an LCO on plant

equipment which is not required by the CTS to be OPERABLE, more restrictive requirements to restore inoperable equipment, and more restrictive SRs.

STS Differences

In electing to adopt the STS, the licensee proposed specifications containing differences from the STS to reflect plant-specific design features and wording preferences, to maintain an existing requirement, and in a few cases to adopt a provision demonstrated by the licensee to be an acceptable change in the licensing basis. The more significant differences from the STS are discussed for each chapter of the ITS.

Relocation of Existing Specifications

The Final Policy Statement states that CTS Section 3/4.0 specifications (LCOs and associated requirements) that do not satisfy or fall within any of the four specified criteria may be relocated to appropriate licensee-controlled documents. In its application, the licensee proposed relocating such specifications to the Final Safety Analysis Report (FSAR), the inservice inspection program, and the LCS, as appropriate. Unless otherwise stated in this safety evaluation, these specifications, which include the limiting conditions for operation (LCOs) (system description, design limits, functional capabilities, and performance levels), existing TS action statements (ACTIONS), and associated surveillance requirements (SRs), are being relocated to the LCS. These provisions will continue to be implemented by appropriate plant procedures: i.e., operating procedures, maintenance procedures, surveillance and testing procedures, and work control procedures.

Control of Specifications, Requirements, and Information Removed from the CTS

The facility and procedures described in the FSAR and LCS, incorporated into the FSAR by reference, can only be revised in accordance with the provisions of 10 CFR 50.59, which ensures an auditable record and establishes appropriate control over requirements removed from CTS and over future changes to the requirements. Other licensee-controlled documents contain provisions for making changes consistent with other applicable regulatory requirements: for example, the Offsite Dose Calculation Manual (ODCM) can be changed in accordance with 10 CFR Part 20; the emergency plan implementing procedures (EPIPs) can be changed in accordance with 10 CFR 50.54(q); and the administrative instructions that implement the Quality Assurance Manual (QAM) can be changed in accordance with 10 CFR 50.54(a) and 10 CFR Part 50, Appendix B. Temporary procedure changes are also controlled by 10 CFR 50.54(a). The documentation of these changes will be maintained by the licensee in accordance with the record retention requirements specified in the licensee's QA plan for WNP-2 and such applicable regulations as 10 CFR 50.59.

The licensee committed by letter dated XX , 1996, to confirm that CTS requirements designated for placement in the FSAR or the LCS are appropriately reflected in these documents, or that they will be included in the next required update of these documents. The licensee has also committed to maintain an auditable record of, and an implementation schedule for, the

procedure changes associated with the development of the ITS. The licensee will also maintain the documentation of these changes in accordance with the record retention requirements in the QA plan and the LCS.

The staff has concluded that appropriate controls have been established for all of the current specifications, information, and requirements that are being moved to licensee-controlled documents. Until incorporated in the FSAR and procedures, changes to these specifications, information, and requirements will be controlled in accordance with the applicable current procedures that control these documents. Following implementation, the NRC will audit the removed provisions to ensure that an appropriate level of control has been achieved. The staff has concluded that, in accordance with the Final Policy Statement, sufficient regulatory controls exist under the regulations, particularly in 10 CFR 50.59. Accordingly, these specifications, information, and requirements, as described in detail in this safety evaluation, may be removed from the CTS and placed in the FSAR or other licensee-controlled documents as specified herein.

