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 AUTH. NAME: BEMIS, P.R. AUTHOR AFFILIATION: Washington Public Power Supply System
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See Proposed Change Do Tech Specs

SUBJECT: Application for amend to license NPF-21 to modify TS for secondary containment & Standby Gas Treatment sys to reflect revised secondary containment drawdown & post-accident analyses results. Affidavit, encl.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

October 15, 1996
GO2-96-199

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NO. NPF-21
REQUEST FOR AMENDMENT TO SECONDARY CONTAINMENT AND
STANDBY GAS TREATMENT SYSTEM TECHNICAL SPECIFICATIONS**

- References:
1. Letter, dated July 29, 1988, CM Powers (SS) to NRC, "Licensee Event Report No. 88-023"
 2. Letter, dated September 30, 1988, CM Powers (SS) to NRC, "Licensee Event Report No. 88-023-01"
 3. Letter, GO2-89-176, dated September 29, 1989, GC Sorensen (SS) to NRC, "Unreviewed Safety Question Regarding Standby Gas Treatment"
 4. Letter, dated October 18, 1989, CM Powers (SS) to NRC, "Licensee Event Report No. 89-040"
 5. Letter, GO2-89-216, dated November 30, 1989, GC Sorensen (SS) to NRC, "Unreviewed Safety Question Regarding Standby Gas Treatment (SGT) System"
 6. Letter, GI2-90-009, dated January 3, 1990, RB Samworth (NRC) to GC Sorensen (SS), "Evaluation of JCO Regarding Standby Gas Treatment System Attainment of Secondary Containment Pressure"
 7. Letter, GO2-90-027, dated February 16, 1990, GC Sorensen (SS) to NRC, "Standby Gas Treatment System (TAC No. 75048)"
 8. Letter, GO2-90-155, dated September 25, 1990, GC Sorensen (SS) to NRC, "Standby Gas Treatment System (TAC No. 75048)"

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REQUEST FOR AMENDMENT TO SECONDARY CONTAINMENT AND STANDBY GAS TREATMENT SYSTEM TECHNICAL SPECIFICATIONS

- References: 9. Letter, GO2-92-076, dated March 31, 1992, JW Baker (SS) to NRC, (cont.) "Licensee Event Report No. 92-008-00"
10. Letter, GO2-92-268, dated December 22, 1992, GC Sorensen (SS) to NRC, "Standby Gas Treatment/Secondary Containment"
11. Letter, GI2-93-110, dated May 5, 1993, JW Clifford (NRC) to GC Sorensen (SS), "Standby Gas Treatment/Secondary Containment (TAC No. M75048)"
12. Letter, GO2-93-151, dated June 11, 1993, JV Parrish (SS) to NRC, "Licensee Event Report No. 92-008-01"
13. Letter, GI2-95-059, dated March 6, 1995, JW Clifford (NRC) to WPPSS, "Summary of Meeting on Post-Accident Containment Response"
14. Letter, GO2-96-170, dated August 21, 1996, DA Swank (SS) to NRC, "Additional Information Regarding the Justification for Continued Operation for the Standby Gas Treatment System"
15. Letter, GO2-95-265, dated December 8, 1995, JV Parrish (SS) to NRC, "Request for Amendment to Technical Specifications"

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 proposed amendment modifies the Technical Specifications for secondary containment and the Standby Gas Treatment (SGT) system to reflect revised secondary containment drawdown and post-accident analyses results. Specifically, the proposed changes:

- (i) *Enhance the secondary containment integrity surveillance requirements by establishing an acceptable operating region as a function of secondary containment differential pressure and SGT system flow.*
- (ii) *Revise the secondary containment and SGT system Technical Specifications to more accurately reflect the existing design which consists of 2 filter trains and 4 divisional subsystems.*
- (iii) *Revise the SGT system surveillance requirements to reflect the change in system flow rate from 4457 cfm to 5000 cfm.*
- (iv) *Delete the existing requirement to maintain the secondary containment at ≥ 0.25 inch of vacuum water gauge at all times (i.e., during normal operation with the nonsafety-related secondary containment ventilation system).*

REQUEST FOR AMENDMENT TO SECONDARY CONTAINMENT AND STANDBY GAS TREATMENT SYSTEM, TECHNICAL SPECIFICATIONS

Attachment 1 provides a detailed discussion of the changes, including background information and the bases for the changes. Attachment 2 contains the figures and tables referenced in the Attachment 1 discussion. Attachment 3 provides marked up copies of the secondary containment and SGT system Technical Specifications and the supporting Bases pages, indicating the proposed changes. Attachment 3A contains the markups of the current WNP-2 Technical Specifications (CTS) and Attachment 3B contains the markups of the Improved Technical Specifications (ITS). The Supply System has proposed (Reference 15) conversion to the ITS based on NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR-6," Revision 1, dated April 1995, and it is expected that approval for conversion to the ITS will precede approval of this amendment request. The indicated Bases changes are included in the markups of the Technical Specifications for information only. The Bases changes will be incorporated into the Technical Specifications by the Supply System when the Technical Specification amendment is issued for implementation.

This proposed change resolves a long standing issue regarding the establishment of secondary containment vacuum under adverse environmental conditions. The issue was reported to the NRC in LERs 88-023, 88-023-01, and 89-040 (References 1, 2, and 4) and also as an unreviewed safety question (USQ) (Reference 3). As evidenced by the large number of docketed correspondence between the Supply System and the NRC staff (see References 1 - 14), the issue has received a significant amount of attention. The information provided in this Technical Specification amendment request is intended to justify the proposed changes as well as document the resolution of related issues identified in the justification for continued operation (JCO) for SGT system attainment of secondary containment pressure. The NRC staff reviewed Revision 0 of the JCO (Reference 3) and were provided with a copy of Revision 5 of the JCO, which contains the current design basis, at the February 6, 1995 meeting (Reference 13) and during a recent engineering inspection (IR 96-11 and Reference 14). Attachment 4 includes a copy of Revision 5 of the JCO and the associated closure information. The JCO closure information has been included to provide a clear documented record of the issues addressed by the JCO and their resolutions.

The short term drawdown analysis was recently re-performed and some of the results vary slightly from those presented at the February 6, 1995 meeting due to more conservative assumptions for heat loading. Also, for consistency with the format and content requirements of the ITS, the proposed changes to the CTS are different than what was presented at the meeting.

Attachment 5 contains model element details and background information pertaining to the GOTHIC computer code. GOTHIC was used in the post-accident analyses which support the proposed changes to the Technical Specifications.

**REQUEST FOR AMENDMENT TO SECONDARY CONTAINMENT AND STANDBY GAS TREATMENT
SYSTEM TECHNICAL SPECIFICATIONS**

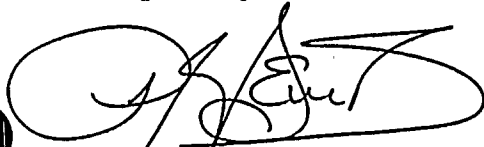
Attachment 6 provides the No Significant Hazards Consideration and Environmental Considerations evaluations. The Supply System has concluded that the proposed changes to the WNP-2 Technical Specifications do not result in a significant hazards consideration. In addition, the changes meet the eligibility 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.

It is also hereby requested that 30 days be allowed for implementation of this proposed amendment to accommodate completion of the required implementation actions.

Should you have any questions or desire additional information regarding this matter, please call me or Ms. L. C. Fernandez at (509) 377-4147.

Respectfully,



P. R. Bemis
Vice President Nuclear Operations
Mail Drop PE23

Attachments:

- 1) Discussion and bases for changes
- 2) Figures and Tables
- 3A) CTS and Bases markup
- 3B) ITS and Bases markup
- 4) JCO (Revision 5) and closure summary
- 5) GOTHIC model comparison information
- 6) No Significant Hazards Consideration and Environmental Considerations evaluations

cc: LJ Callan - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
NS Reynolds - Winston & Strawn
TG Colburn - NRR
DL Williams - BPA/399
NRC Sr. Resident Inspector - 927N
FS Adair - EFSEC

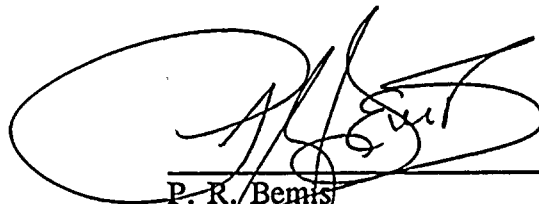


STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Amendment to Technical Specifications
Secondary Containment and Standby Gas
Treatment System

I, P. R. BEMIS, being duly sworn, subscribe to and say that I am the Vice President, Nuclear 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.

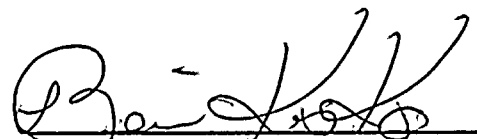
DATE 10/15, 1996



P. R. Bemis
Vice President, Nuclear Operations

On this date personally appeared before me P. R. BEMIS, 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 15 day of October 1996.



Notary Public in and for the
STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 4/28/98

