

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

ACCESSION NBR: 9701210429 DOC. DATE: 96/12/20 NOTARIZED: NO DOCKET #
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Power 05000397
 AUTH. NAME AUTHOR AFFILIATION
 PARRISH, J.V. Washington Public Power Supply System
 RECIP. NAME RECIPIENT AFFILIATION
 CALLAN, L.J. Region 4 (Post 820201)

SUBJECT: Requests enforcement discretion from DG testing per TS
 3.8.1.1.A. Request specifically asks that SR 4.8.1.1.2.a.4
 not be repeated for duration of current entry to TS Action
 3.8.1.1.a.

DISTRIBUTION CODE: IE01D COPIES RECEIVED: LTR 1 ENCL 0 SIZE: 5
 TITLE: General (50 Dkt)-Insp Rept/Notice of Violation Response

NOTES:

	RECIPIENT ID CODE/NAME	COPIES LTR ENCL	RECIPIENT ID CODE/NAME	COPIES LTR ENCL
	PD4-2 PD	1	COLBURN, T	1
INTERNAL:	ACRS	2	AEOD/SPD/RAB	1
	AEOD/TTC	1	DEDRO	1
	<u>FILE CENTER</u>	1	NRR/DISP/PIPB	1
	NRR/DRCH/HHFB	1	NRR/DRPM/PECB	1
	NRR/DRPM/PERB	1	NUDOCS-ABSTRACT	1
	OE DIR	1	OGC/HDS3	1
	RGN4 FILE 01	1		
EXTERNAL:	LITCO BRYCE, J H	1	NOAC	1
	NRC PDR	1		

Tim Colburn
 013E-16

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: LTR 20 ENCL 0

C
A
T
E
G
O
R
Y
1
D
O
C
U
M
E
N
T

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

December 20, 1996
GO2-96-247

Docket No. 50-397

Mr. L.J. Callan
NRC Regional Administrator
U.S. NRC, Region IV
611 Ryan Plaza Drive
Arlington, Texas 76011-8064

Dear Mr. Callan:

Subject: **WNP-2, OPERATING LICENSE NPF-21
REQUEST FOR ENFORCEMENT DISCRETION FROM DIESEL
GENERATOR TESTING PER TECHNICAL SPECIFICATION 3.8.1.1.A**

- References:
1. NUREG 1434, "Standard Technical Specification General Electric Plants, BWR 6"
 2. Letter GO2-95-265 dated December 8, 1995, JV Parrish (SS) to NRC, "Request For Amendment To Technical Specifications"
 3. USNRC Administrative Letter 95-05 dated November 7, 1995, "Revisions to Staff Guidance for Implementing NRC Policy on Notices of Enforcement Discretion"
 4. USNRC Generic Letter 93-08, dated September 27, 1993, "Line-Item Technical Specifications Improvements to Reduce Surveillance Requirements for Testing During Power Operation"

The Supply System hereby requests enforcement discretion from continued testing of emergency Diesel Generators 2 and 3 (DG-2 and DG-3) in accordance with Technical Specification Action 3.8.1.1.a. In particular, the Supply System requests that Surveillance Requirement 4.8.1.1.2.a.4 not be repeated for the duration of the current entry into Technical Specification Action 3.8.1.1.a. Entry into this Action statement is the result of Service Water Pump 1A (SW-P-1A) instantaneous overcurrent relay trip in preparation for Residual Heat Removal pump 2C (RHR-P-2C) troubleshooting. The Supply System will address below each of the 12 criteria identified in Reference 3.

TEC1
10 Add: Tim Colburn
013E-16

REQUEST FOR ENFORCEMENT DISCRETION FROM DIESEL GENERATOR TESTING PER TECHNICAL SPECIFICATION 3.8.1.1.A

Pursuant to the requirements of Technical Specification Action 3.8.1.1.d, the Supply System verified operability of required systems, subsystems, trains, components, and devices that depend on the remaining DGs. In response to the Technical Specification Action entry for DG-1, the Supply System has placed Division 2 and 3 equipment in a "protected" condition. This eliminates non-mandatory work and testing on this equipment to ensure that it remains available should it be needed. In addition, all other offsite power supplies remain available to supply the Division 1, 2, and 3 equipment.

The Supply System has contacted The Bonneville Power Administration (BPA) regarding planned activities on the local electrical grid. Although severe weather was originally anticipated, there is moderate weather predicted for the duration of the enforcement discretion period. BPA does not have work currently planned during this time period and has agreed to contact Supply System prior to any potentially impacting activities.

1. The Supply System requests that testing, as required by Technical Specification Action 3.8.1.1.a, not be repeated for the duration of the current entry into Technical Specification Action 3.8.1.1.a. A trip of Standby Service Water pump 1A (SW-P-1A) on overcurrent occurred at 0801 hours on December 20, 1996, resulting in entry into Technical Specification Actions 3.7.1.1.a.1, 3.7.1.1.d, 3.8.1.1.a, and 3.8.1.1.d. DG-2 and DG-3 are operable. This Technical Specification entry is due solely to SW-P-1A inoperability. Technical Specification 3.8.1.1.a states:

- a. With either one offsite circuit or DG-1 or DG-2 of the above required A.C. electrical power sources inoperable, demonstrate the OPERABILITY of the remaining A.C. sources by performing Surveillance Requirements 4.8.1.1.1.a. within 1 hour and 4.8.1.1.2.a.4., for one diesel generator at a time, within 4 hours and at least once per 8 hours thereafter; restore at least two offsite circuits and DG-1 and DG-2 to OPERABLE status within 72 hours or be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the following 24 hours.

In response to this requirement, DG-2 and DG-3 were tested within 4 hours. This request is to allow discontinuance of the testing of DG-2 and DG-3 on an 8 hour frequency for the duration of the current entry into Technical Specification Action 3.8.1.1.a.

2. The requested enforcement discretion is needed due to the unexpected failure of SW-P-1A during a routine start. The root cause of the failure has not yet been determined. Testing performed to date, and testing performed pursuant to Technical Specification 3.8.1.1.a today, have demonstrated that DG-2 and DG-3 are operable and capable of performing their intended safety functions. Prompt action is necessary to eliminate repetitive fast starts, and the associated induced wear of DG-2 and DG-3.

REQUEST FOR ENFORCEMENT DISCRETION FROM DIESEL GENERATOR TESTING PER TECHNICAL SPECIFICATION 3.8.1.1.A

As stated, the failure mode evaluation for SW-P-1A is not complete at this time. Evaluation of the issue identified four potential failure mechanisms, i.e., the pump motor, cabling, breaker, and relay. The initial observations of attempted pump start and subsequent walkdowns of the service water pond and pump area recorded no abnormalities. We have satisfactorily completed insulation resistance testing (megger) for the pump motor and associated cables, a visual breaker inspection, and confirmed relay setpoints were consistent with the previous calibration settings. The remaining potential cause, relative only to SW-P-1A, is a recently modified setpoint for the SW-P-1A overcurrent relay, changed as the result of implementation of a relay coordination effort. This resulted in approximately a 30% lower setpoint. Evaluation is underway to establish whether this setpoint reduction unnecessarily encroached upon the normal operating band.

3. The safety basis for the requested enforcement discretion is the elimination of unnecessary wear of DG-2 and DG-3. These DGs are being relied upon, in the absence of DG-1, to provide backup emergency power for engineered safety features equipment. As identified previously by the industry and the NRC in NUREG 1434, a single test within 24 hours for the operable DGs is adequate to demonstrate the lack of a common mode failure condition upon failure of one DG. In addition, this reduced testing results in reduced wear and resultant potential equipment failure at a time when the plant is in a slightly degraded condition due to the inoperability of DG-1. As such, the requested elimination of additional testing of DG-2 and DG-3 results in an increase in overall plant safety, when compared with repetitive testing for the operable DGs, with no identified negative potential consequences.

A probabilistic safety assessment evaluation was conducted for the proposed enforcement discretion. A Weibull analysis of available DG-1 failure data shows that most failures are wear or start related. DG-2 and DG-3 failure data are believed to be consistent with this data. If it is assumed that 20% of the failure data for DGs is demand related, the remaining 8 hour testing (12 additional tests for DG-2 and DG-3), in conjunction with DG-1 out of service, would result in a significant increase in core damage frequency.

4. The short duration, less than 5 days, that the enforcement discretion will be in effect will not negatively impact plant safety and will provide for increased reliability of DG-2 and DG-3. As such, there will be an increase in the protection of the public health and safety.

Since DG reliability, and thus supported engineered safety feature reliability, will be improved, the proposed enforcement discretion will result in no increase in the probability or consequences of an accident or malfunction of equipment important to safety previously evaluated. As the elimination of testing results in a net increase in system reliability, and because there will be no change in plant equipment or the manner in which equipment is operated (other than reduced repetitive testing), there will be no potential for a new or different kind of accident or malfunction from any previously evaluated. Because this enforcement discretion will not result in a change in the available equipment, and improves reliability of available equipment, the

REQUEST FOR ENFORCEMENT DISCRETION FROM DIESEL GENERATOR TESTING PER TECHNICAL SPECIFICATION 3.8.1.1.A

margin of safety is not reduced. Therefore, the proposed enforcement discretion does not involve an unreviewed safety question nor a significant hazards consideration.

5. The Supply System has reviewed the proposed enforcement discretion request and concluded that the request does not involve adverse consequences to the environment. The proposed elimination of additional DG testing will result in increased reliability of the operable DGs. As such, the supported engineered safety features equipment will be available in the event of a loss of offsite power. This supported equipment provides for mitigation of the consequences of accidents. Therefore, the requested enforcement discretion decreases the potential for adverse consequences to the environment by increasing the reliability of the DGs and supported mitigation equipment.

6. The proposed compensatory measure is to perform Surveillance Requirement 4.8.1.1.1.a every 8 hours. This is a check of the offsite power supplies and is consistent with the offsite circuit checks required in the improved standard Technical Specifications (ITS). In response to the Technical Specification Action entry for DG-1, the Supply System has placed Division 2 and 3 equipment in a "protected" condition. This eliminates non-mandatory work and testing on this equipment to ensure that it remains available should it be needed. In addition, all other offsite power supplies remain available to supply the Division 1, 2, and 3 equipment.

7. The current Technical Specification Action allowable outage time (AOT) of 72 hours expires at 0801 hours on December 23, 1996. Following the 72 hour AOT, Technical Specification Actions 3.7.1.1.a.1 and 3.8.1.1.a require a shutdown to Hot Shutdown within the following 12 hours and to Cold Shutdown within the following 24 hours. As such, enforcement discretion is requested for a time period not to extend beyond 2001 hours on December 24, 1996. This will preclude DG testing requirements during the shutdown sequence, should shutdown be required. Significant power changes, unless required by the Technical Specifications, will be communicated to the Region prior to implementation during this time period.

8. The requested enforcement discretion has been reviewed and approved by the Plant Operations Committee on December 20, 1996.

9. This enforcement discretion meets criterion 1(b) of section B of Inspection Manual Part 9900 (included in Reference 4). The eliminated testing is the start of DG-2 and DG-3 every eight hours required by Technical Specification Action 3.8.1.1.a.

10. No follow-up license amendment request is required. Per Reference 2, the Supply System requested the required Technical Specification amendment, consistent with Reference 1.

11. Implementation of either the ITS or the Reference 4 recommendations would have eliminated the need for this enforcement discretion by allowing the 24 hours for the initial operability

Page 5

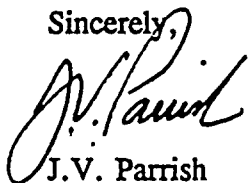
**REQUEST FOR ENFORCEMENT DISCRETION FROM DIESEL GENERATOR
TESTING PER TECHNICAL SPECIFICATION 3.8.1.1.A**

verification of DG 2 and DG 3 with no additional testing required. The Supply System submitted an amendment request via Reference 2 to implement the ITS. Reference 2 is currently under staff review. Reference 4 was not implemented in anticipation of ITS implementation.

12. The Supply System knows of no additional information that is necessary for processing of this request.

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

Sincerely,



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

cc: JE Dyer - NRC RIV
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office
TG Colburn - NRR
RC Barr NRC Sr. Resident Inspector - 927N
NRC Document Control Desk
DL Williams - BPA/399
NS Reynolds - Winston & Strawn

198

198