

# CATEGORY 1

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SUBJECT: Requests enforcement discretion for period of 45 days from  
 TS Action 3.6.1.3.A required to isolate purge line & verify  
 penetration flow path isolated every 31 days.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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August 12, 1997  
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Docket No. 50-397

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Washington, DC 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
REQUEST FOR ENFORCEMENT DISCRETION FROM REQUIRED  
ACTIONS OF TECHNICAL SPECIFICATION 3.6.1.3.A**

Reference: USNRC Administrative Letter 95-05 dated November 7, 1995, "Revisions to Staff Guidance for Implementing NRC Policy on Notices of Enforcement Discretion"

The Supply System hereby requests enforcement discretion from the required actions associated with Technical Specification (TS) Action 3.6.1.3.A. The Supply System has determined that traversing in-core probe (TIP) purge line check valve, TIP-V-6, was not verified closed during the recent refueling outage as required by the Inservice Testing (IST) Program. TS Action 3.6.1.3.A requires that a penetration flow path with an inoperable primary containment isolation valve (PCIV) be isolated. The action specified by TS 3.6.1.3.A has been taken by closing TIP-V-15, thus isolating the purge line penetration to primary containment.

Because of the potential for TIP system degradation with the purge line isolated, the Supply System requests enforcement discretion for a period of 45 days from the TS 3.6.1.3.A required actions to isolate the purge line and verify the penetration flow path isolated every 31 days. During this 45 day period, the Supply System will submit for staff approval an exigent TS Amendment request that would exempt TIP-V-6 from the TS 5.5.6 IST Program requirements to full stroke TIP-V-6 to the closed position each refueling outage. The exigent TS Amendment would be in effect for the duration of the current operating cycle. In addition, the Supply System will verify TIP-V-6 full strokes to the closed position should there be a forced outage of sufficient duration that would allow containment to be deinerted and the test to be performed. The Supply System hereby addresses below each of the 12 criteria identified in the Reference.

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**REQUEST FOR ENFORCEMENT DISCRETION FROM REQUIRED ACTIONS OF  
TECHNICAL SPECIFICATION 3.6.1.3.A**

1. The Supply System requests that the required action of TS 3.6.1.3.A.1 and A.2 not be required for TIP-V-6 during a 45 day time period starting with staff approval of this request for enforcement discretion. TIP-V-6 is presently inoperable because a refueling interval IST test requirement to verify the valve full strokes to the closed position was not performed. TS Action 3.6.1.3.A.1 requires that a penetration flow path with an inoperable primary containment isolation valve (PCIV) be isolated "by the use of at least one closed and deactivated automatic valve, closed manual valve, blind flange, or check valve with flow through the valve secured." Technical Specification Action 3.6.1.3.A.2 requires the affected penetration flow path be verified isolated every 31 days. The Supply System met the required actions of TS 3.6.1.3.A.1 by closing and deactivating TIP-V-15 to isolate the TIP purge line penetration.
2. On July 17, 1997 the IST Program Lead Engineer discovered an error documented in an IST procedure. The procedure is used to exercise TIP-V-6 open and closed as required by the WNP-2 IST Program Plan and is to be performed each refueling outage. The procedure allows credit to be taken for successful completion of a Local Leak Rate Test (LLRT) of the valve if the LLRT is performed during the current refueling outage. In lieu of current LLRT results, the procedure provides discrete steps for verifying valve closure by pressurizing the TIP purge line from a point downstream of the check valve. The Supply System initially concluded that TIP-V-6 was operable but nonconforming using Generic Letter 91-18 guidance. However, after discussion with the staff on August 12, 1997, the Supply System has determined that LCO 3.6.1.3 must be declared not met.

No LLRT of TIP-V-6 was performed (or required) during this refueling outage (R-12) and the discrete steps for close position verification were not performed. Instead, LLRT results for this valve from the previous refueling outage (R-11) were erroneously used (as indicated by a 1996 test date) and the procedure was incorrectly accepted as complete.

Prompt action is required to permit the TIP purge line penetration to remain unisolated. It is essential to allow the TIP system to remain pressurized to prevent degradation of TIP components and allow axial neutron flux traces of the reactor core. The Nitrogen purge keeps moisture from entering the TIP indexers and tubing. Moisture can degrade the lubricant used inside the TIP tubing, potentially causing obstructions to TIP probe travel. Obstructions could preclude the use of TIP for the calibration function, ultimately resulting in a plant shutdown.

3. Allowing the affected penetration to remain unisolated until an exigent TS Amendment can be approved by the staff does not create a safety concern. Although TIP-V-6 is considered inoperable due to a test not being performed, the valve is still considered to be functional and capable of closing during design basis accident conditions. TIP-V-6 is required to be verified closed every refueling outage based on the refueling outage justification ROJ04 provided in the IST Program Plan.

Review of historical maintenance and test data has shown that this valve had only one LLRT failure, in 1989. Subsequent disassembly found a small amount of debris on the seat of the valve. The valve has passed subsequent leak rate and IST program tests. This valve was



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**REQUEST FOR ENFORCEMENT DISCRETION FROM REQUIRED ACTIONS OF  
TECHNICAL SPECIFICATION 3.6.1.3.A**

disassembled as a part of the Check Valve Reliability Program during the 1996 refueling outage and was found to be in excellent condition. Freedom of movement and system cleanliness were verified.

Review of LLRT data for this valve since disassembly in 1989 indicates that valve leakage has been well below the established ASME leakage limit (ASME leakage limit is 74 standard cubic centimeters per minute (sccm); previous test results range from 0 to 23 sccm). The WNP-2 Primary Containment Leakage Rate Test Program developed in accordance with Appendix J, Option B, has provided a leak rate testing interval for TIP-V-6 of five years based on previous valve performance. Based on previous performance the valve can be expected to reliably perform its containment isolation function until the next refueling outage.

Since the component reliability assumed in the Probabilistic Safety Assessment (PSA) remains unchanged by this condition, core damage frequency and conditional containment failure probabilities are not affected.

During accident conditions, containment integrity is provided by closure of TIP-V-6. TIP-V-6 has demonstrated reliability through testing and inspection. The outboard primary containment automatic isolation valve, TIP-V-15, provides redundant isolation for this penetration.

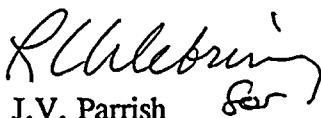
4. Allowing the affected penetration to remain unisolated for up to 45 days does not represent a situation that is potentially detrimental to the public health and safety. As discussed in item 3 above, TIP-V-6 is expected to close during design basis accident conditions. Primary containment integrity will also be maintained during design basis accident conditions by automatic isolation of TIP-V-15. Based on a review of historical maintenance and test data, allowing the TIP-V-6 penetration to remain unisolated for up to 45 days does not represent an unreviewed safety question nor does it involve a significant hazards consideration per the criteria of 10 CFR 50.92
5. Allowing the affected penetration to remain unisolated for up to 45 days will not have an adverse impact on the environment. Based on a review of historical maintenance and test data, TIP-V-6 is expected to function as designed to isolate the affected penetration. Therefore, there is no significant change in the types or significant increase in the amounts of any effluents that may be released offsite. Additionally, there is no significant increase in individual or cumulative occupational radiation exposure.
6. There are no compensatory measures proposed. Historical valve performance reflects a high degree of component reliability, and as such, no compensatory measures are necessary.
7. It is requested that enforcement discretion for non-compliance with TS Action 3.6.1.3.A be in effect for 45 days to allow time for processing of an exigent TS Amendment request. Past testing and inspection demonstrates the functional condition of the valve, and provides reasonable assurance of performance.
8. The requested enforcement discretion has been approved by the Plant Operations Committee.

**REQUEST FOR ENFORCEMENT DISCRETION FROM REQUIRED ACTIONS OF  
TECHNICAL SPECIFICATION 3.6.1.3.A**

9. This requested enforcement discretion meets criterion 1(a) of section B of Part 9900. Enforcement discretion is required to avoid the transient associated with a forced plant shutdown which would result from long term isolation of the TIP penetration. The Supply System considers repetitive opening of TIP-V-15 under administrative controls, as permitted by TS 3.6.1.3, to be undesirable.
10. An exigent TS Amendment request will be submitted to the staff within 48 hours. Attached is marked-up page 5.0-11 showing the proposed change.
11. Adoption of "Improved" Technical Specifications at WNP-2 has not eliminated the need for this request for enforcement discretion.
12. The Supply System knows of no additional information that will be needed by the staff.

Should you have any questions or desire additional information regarding this matter, please contact P. J. Inserra at (509) 377-4147.

Respectfully,

  
J.V. Parrish  
Chief Executive Officer  
Mail Drop 1023

Attachment

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