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SUBJECT: Application for amend to License NPF-21, modifying inservice
 testing requirements specified in TS 5.5.6 for inboard
 primary containment isolation valve on transvering in-core
 probe (TIP) sys nitrogen purge line.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

August 14, 1997
GO2-97-156

Docket No. 50-397

U.S. Nuclear Regulatory Commission
Document Control Desk
Washington, DC 20555

Gentlemen:

Subject: **WNP-2 OPERATING LICENSE NPF-21
EXIGENT REQUEST FOR AMENDMENT
FOR IST PROGRAM FULL STROKE TESTING REQUIREMENTS**

Reference: Letter, GO2-97-155, dated August 12, 1997, JV Parrish (Supply System) to NRC,
"Request for Enforcement Discretion From Required Actions of Technical
Specification 3.6.1.3.A"

In accordance with the Code of Federal Regulations, Title 10, Parts 50.91, 50.90 and 2.101, the Supply System hereby submits a request for amendment, under exigent circumstances, to the WNP-2 Operating License. Specifically, the Supply System is requesting modification of the Inservice Testing (IST) requirements specified in Technical Specification (TS) 5.5.6 for the inboard primary containment isolation valve (PCIV) on the Transversing In-core Probe (TIP) System nitrogen purge line.

This Technical Specification amendment request is submitted consistent with the Reference commitment and the approval of this amendment will resolve the need for enforcement discretion. Approval of the proposed amendment on an exigent basis is warranted due to the 45 day enforcement discretion period ending on September 27, 1997, and due to the potential for system degradation associated with isolating the nitrogen purge line to the TIP System for the duration of the current operating cycle. Furthermore, it is requested that the staff review and approve this amendment request to allow implementation by Friday, September 26, 1997 so as not to exceed the 45 day enforcement discretion period.

The proposed change would revise TS 5.5.6 by adding a note that would extend the interval requirement to perform the full stroke exercise testing of TIP-V-6 until the 1998 refueling outage, until a plant shutdown of sufficient duration occurs to allow TIP-V-6

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**EXIGENT REQUEST FOR AMENDMENT
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testing, or until May 15, 1998, whichever occurs first. For the purpose of this amendment, a "plant shutdown of sufficient duration" is defined as an outage expected to last at least three days. This duration is based on the time required for de-inerting containment, performance of the IST testing, and the subsequent re-inerting of containment.

On July 17, 1997, the Supply System identified a failure to perform the required full stroke testing of TIP-V-6. After consultation with the staff on August 12, 1997, it was determined that because of the failure to complete the required testing, the TIP penetration was required to be isolated per TS Required Action 3.6.1.3.A. However, isolation of the nitrogen purge to the TIP System would allow moisture intrusion into the TIP indexers and tubing, potentially degrading the lubricant and causing obstructions to TIP probe travel. Obstructions could preclude the use of TIP for the calibration function, ultimately resulting in a forced plant shutdown.

When the failure to perform the testing was discovered, the Supply System determined that the valve was operable but non-conforming, following the guidance in Generic Letter 91-18, section 6.1. However, as previously discussed, it was determined that LCO 3.6.1.3 must be declared not met as a result of not performing the IST test. Since this determination was made on August 12, 1997 it was not possible to submit this request on a more timely basis. The Supply System has concluded that there is less risk in relying on the ability of the two functional PCIV's installed on the penetration line to perform their design safety function than in performing a plant shutdown in order to perform the required testing.

Attachment 1 provides the basis for acceptability of the amendment request. Attachment 2 contains mark-ups identifying the proposed changes to the Technical Specifications. Attachment 3 provides the No Significant Hazards Consideration and Environmental Considerations evaluations. The Supply System has concluded that the proposed change to the WNP-2 Technical Specifications does not result in a significant hazards consideration. In addition, the change meets 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 change is not required.

The TS 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.

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FOR IST PROGRAM FULL STROKE TESTING REQUIREMENTS**

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

Respectfully,



R. L. Webring
Vice President Operations Support/PIO
Mail Drop PE08

Attachments:

1. Basis for Technical Specification Amendment Request
2. Proposed Revised Technical Specifications
3. Evaluation of Significant Hazards Considerations and
Environmental Assessment Applicability Review
4. Summary of TIP-V-6 and TIP-V-15 Historical Testing Results
5. Revised Technical Specification Pages

cc: EW Merschoff - NRC RIV
KE Perkins, Jr. - NRC RIV, WCFO
TG Colburn - NRR
NRC Sr. Resident Inspector - 927N
DL Williams - BPA/399
CR Wallis - EFSEC
PD Robinson - Winston & Strawn

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Exigent Request For Amendment
For IST Program Full Stroke
Testing Requirements

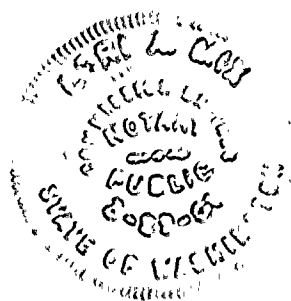
I, R. L. WEBRING, being duly sworn, subscribe to and say that I am the Vice President, Operations Support/PIO for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE 8/14/, 1997

R. L. Webring
R. L. Webring
Vice President, Operations Support/PIO

On this date personally appeared before me R. L. WEBRING, 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.

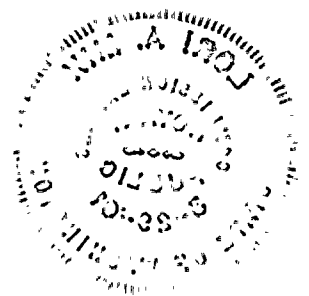
GIVEN under my hand and seal this 14th day of August 1997.



G. M. Mix
Notary Public in and for the
STATE OF WASHINGTON

Residing at W. Richland

My Commission Expires 3-29-01



**EXIGENT REQUEST FOR AMENDMENT FOR
IST PROGRAM FULL STROKE TESTING REQUIREMENTS**
Attachment 1, Page 1 of 2

BASIS FOR CHANGE

Background:

The proposed change would extend the interval for the Technical Specifications Inservice Testing (IST) requirements for TIP-V-6. Specifically, the interval would be extended to the next shutdown of sufficient length to conduct the test or May 15, 1998, whichever occurs first. The test demonstrates the full stroke movement of the valve and is required to be performed during each refueling outage. Following the startup from R12, it was discovered that during the testing of TIP-V-6, the full stroke exercising to the closed position had not been verified. Performance of this IST test would require an entry into primary containment which requires containment de-inerting. The most recent performance of the close verification for TIP-V-6 was in June, 1996.

The accident mitigation function of TIP-V-6 is to isolate the internal side of the containment penetration nitrogen purge supply line to the TIP indexers and guide tubes. Should TIP-V-6 fail, the external isolation valve (TIP-V-15) also serves the isolation function for this penetration.

Justification:

The full stroke exercise testing requirement of the IST program is to assure freedom of movement of the obturator of the valve. The failure to stroke test TIP-V-6 does not decrease the reliability of the valve. A review of historical maintenance and test data has shown that this valve has only one local leak rate test (LLRT) failure, which occurred in 1989. The LLRT failure mechanism was determined to be debris on the valve seat. The valve has subsequently passed leak rate and IST program tests. The leak rate trend data has been between 0 and 23 standard cubic centimeters per minute (sccm), well below the 74 sccm administrative limit. Because of the high reliability, TIP-V-6 has qualified for a LLRT program interval of 5 years per 10 CFR 50, Appendix J, Option B. Additionally, TIP-V-6 was internally inspected as part of the check valve reliability program during the R11 outage (April 1996) and was found to be in satisfactory condition.

The isolation of the penetration is further assured by the outboard isolation valve, TIP-V-15. The probability that TIP-V-15 would fail is not affected by the failure to perform the full stroke exercise test on TIP-V-6. A review of the maintenance and IST history of TIP-V-15 has shown no failure since the replacement of TIP-V-15 in May 1988. The leak rate and stroke time trend data of TIP-V-15 demonstrate reliable performance with leak rates of less than 75 sccm and closing times under 0.5 seconds. These are well under the leakage limit of 148 sccm and the stroke time high action alert criteria of 2 seconds.

The equipment testing history is provided in Attachment 4 to this letter.

**EXIGENT REQUEST FOR AMENDMENT FOR
IST PROGRAM FULL STROKE TESTING REQUIREMENTS**
Attachment 1, Page 2 of 2

In conclusion, the Supply System has determined that with the reliability of TIP-V-6, combined with the redundant protection provided by the operable TIP-V-15, the continued operation of WNP-2, with the next required testing of TIP-V-6 being extended to as late as May 15, 1998, does not pose an increased risk to public health and safety.

**OPERATING LICENSE AMENDMENT REQUEST
FOR IST PROGRAM FULL STROKE TESTING REQUIREMENTS
Attachment 2, Page 1 of 3**

Revised Technical Specifications

Technical Specification 5.5.6, Inservice Testing program (page 5.0-11) is modified by adding an asterisk, with a note at the bottom of the page, that reads:

* The Inservice Testing Program requirement for full stroke exercise testing at each refueling outage for TIP-V-6 shall not be required for the refueling outage conducted in the Spring, 1997. This exception shall expire upon reaching MODE 4 for a plant shutdown of sufficient duration to allow TIP-V-6 testing, or May 15, 1998, whichever occurs first.

Three lines from 5.5.7 were moved from page 5.0-11 to 5.0-12 in order to make room for the above note.

See the following TS change mark-up.