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SUBJECT: Submits withdrawal of request for amend to secondary containment & standby gas treatment sys TS.Util currently plan to re-submit amend request in entirety by 991112.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM
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July 16, 1999
GO2-99-133

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21**
WITHDRAWAL OF REQUEST FOR AMENDMENT TO SECONDARY CONTAINMENT AND STANDBY GAS TREATMENT SYSTEM TECHNICAL SPECIFICATIONS

References:
1) Letter GO2-96-199 dated October 15, 1996, PR Bemis (SS) to NRC, "Request for Amendment to Secondary Containment and Standby Gas Treatment System Technical Specifications"

2) Letter dated May 28, 1999, Jack Cushing (NRC) to JV Parrish (SS), "Supplemental Request for Additional Information (RAI) for the Washington Public Power Supply System Nuclear Project No. 2 (WNP-2) (TAC NO. M96928)"

In the first reference, we requested an amendment to the WNP-2 Technical Specifications for secondary containment and the standby gas treatment system to reflect revised secondary containment drawdown and post-accident analysis results. Included in our amendment request was an analytical design basis change to increase the allowable secondary containment bypass leakage from 0.74 scfh to 18 scfh.

In the second reference, the staff requested that additional information be provided to support its review of our pending amendment request. In part, we were asked to provide additional detail of the modeling of secondary containment bypass leakage in our radiological model for the loss-of-coolant accident and the associated relationship to 18 scfh. Specifically, the staff requested that we provide information on how the leakage rate was adjusted for post-accident pressure and temperature conditions inside the drywell and wetwell.

Based upon a follow-up assessment, we hereby withdraw the amendment request due to the discovery of a non-conservative error in the methodology for computing the volumetric expansion that was used to determine the containment release concentration.

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The error pertained to the methodology used for increasing the bypass leakage to 18 scfh. In order to compute the source term concentration (Ci/ft^3) for release in the offsite dose calculation, the volume in containment has to be expanded to standard temperature and pressure. The bypass leakage value had been computed for a containment release condition of 5 cfh, and then converted to standard conditions with a resultant allowable bypass leakage limit of 18 scfh. However, the derivation of this conversion factor was non-conservative in that it did not account for the impact of temperature on the containment volume. The impact of the error associated with the proposed secondary containment bypass leakage value of 18 scfh is limited solely to the determination of off-site dose and has no affect on the drawdown analysis.

Withdrawal of the amendment request also has no impact on our existing Justification for Continued Operation. As stated in our original submittal (Reference 1), the increase in the allowable secondary containment bypass leakage from 0.74 scfh to 18 scfh was considered an analytical change to the design basis and did not affect the operability of secondary containment or the standby gas treatment system. Therefore, the analytical change was not incorporated into the Justification for Continued Operation (which includes the current design basis).

Efforts are in progress to correct the methodology error and recalculate the value for allowable secondary containment bypass leakage. We expect that the recalculated value will be less than 18 scfh, but greater than 0.74 scfh. We currently plan to re-submit the amendment request in its entirety by November 12, 1999.

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

Respectfully,

RL Webring
Vice President, Operations Support/PIO
Mail Drop PE08

cc: EW Merschoff - NRC RIV
JS Cushing - NRC NRR
NRC Sr. Resident Inspector - 927N
DL Williams - BPA/1399
PD Robinson - Winston & Strawn
DJ Ross - EFSEC