



GULF STATES UTILITIES COMPANY

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July 11, 1985
RBG - 21538
File Code - G9.5

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1
Docket No. 50-458

Provided for your review and approval is Gulf States Utilities Company's request for a River Bend Station Technical Specification one time exception. The request, as detailed below, is to allow the use of the drywell vent and purge system while in operational condition modes 2 and 3 for up to a cumulative time not to exceed twenty-four (24) hours. Attachment 1 to this letter provides the proposed River Bend Station Technical Specification.

During the hot functional test at River Bend Station, ammonia levels in excess of 50 ppm were experienced. This was due to the particular type of insulation used in the drywell area which offgasses ammonia when heated. Gulf States Utilities uses a KNAUF manufactured high temperature fiberglass panel and molded pipe covering fiberglass insulation in the drywell area. In each type, the fiberglass insulation is bound in a phenolic resin which is responsible for the ammonia offgas. The ammonia is typically depleted in the binder after a short period of time when exposed to high temperatures.

It is anticipated that during the initial heatup testing at River Bend Station, offgassing will occur. Calculations have been performed indicating that for the panels and covers which have undergone hot functional testing, the offgas ammonia levels will be greater than 15 ppm. Additionally, approximately 50 percent of the molded pipe covers and approximately 10 percent of the panels have been replaced since the hot functional test. The heatup of this new insulation will result in an additional source of ammonia offgassing.

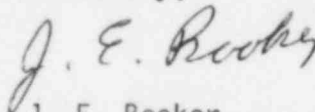
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The initial heatup to rated temperature and pressure will require personnel entry and access to the drywell for approximately a ten day period to perform various startup test procedures. Included in these various procedures is the walkdown of all piping and the measuring of pipe movement when temperatures of 300° F and 540° F are reached. Each of these efforts will require approximately 20 manhours in the drywell.

In light of this one time concern with excessive accumulation of ammonia coincident with required personnel entry into the drywell, Gulf States Utilities is requesting a one time exception to the River Bend Station Technical Specifications to allow the use of the drywell vent and purge system while in OPERATIONAL CONDITION 2 and 3 for up to a cumulative time of 24 hours. This time will allow for venting of the expected offgassed ammonia and maintain an acceptable atmosphere for personnel access for this brief period at power levels of less than 5 percent.

Sincerely,



J. E. Booker
Manager - Engineering
Nuclear Fuels & Licensing
River Bend Nuclear Group

Attachment

JEB/WJR/DWW/JEP

ATTACHMENT 1

CONTAINMENT SYSTEMS

DRYWELL VENT AND PURGE

LIMITING CONDITION FOR OPERATION

3.6.2.7 The drywell vent and purge system supply and exhaust valves shall be sealed closed.* Sealed closed barriers include blind flanges and sealed closed isolation valves which may be closed manual valves, closed remote-manual valves, and closed automatic valves which remain closed after a loss-of-coolant accident. Sealed closed isolation valves should be under administrative control to assure that they cannot be inadvertently opened. Administrative control includes mechanical devices to seal or lock the valve closed, or to prevent power from being supplied to the valve operator.

APPLICABILITY: OPERATIONAL CONDITIONS 1, 2, and 3.

ACTION:

- a. With the drywell vent and purge system supply or exhaust valves open in OPERATIONAL CONDITIONS 1, 2, or 3, and immediately close the drywell vent and purge system valves and be in at least HOT SHUTDOWN within the next 12 hours and in COLD SHUTDOWN within the next 24 hours.

SURVEILLANCE REQUIREMENTS

4.6.2.7 At least once per 31 days, verify the drywell vent and purge system supply and exhaust valves to be sealed closed.*

* The drywell vent and purge system may be used when venting ammonia for a cumulative time not to exceed 24 hours provided that THERMAL POWER does not exceed 5 percent RATED THERMAL POWER.