

**ENERGY  
NORTHWEST**

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

October 12, 2000  
GO2-00-177

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION  
SURVEILLANCE REQUIREMENT SR 3.6.1.3.8  
(ADDITIONAL INFORMATION)**

Reference: Letter, dated October 3, 2000, Jack Cushing (NRC) to JV Parrish (Energy Northwest) "Request for Additional Information (RAI) for WNP-2, (TAC NO. MA9063)"

In the reference, the staff requested that additional information be provided to support review of our pending request for an amendment to revise Surveillance Requirement SR 3.6.1.3.8 of the Technical Specifications.

The additional information is included as an attachment. This attachment contains no proprietary information.

Should you have any questions or desire additional information regarding the matter, please call me or JE Rhoads at (509) 377-4298.

Respectfully,



PJ Inserra  
(Acting) Manager, Regulatory Affairs  
Mail Drop PE20

Attachment

cc: EW Merschoff - NRC RIV  
JS Cushing - NRC NRR  
NRC Sr. Resident Inspector - 988C

DL Williams - BPA/1399  
TC Poindexter - Winston & Strawn

ADDY

AFFIDAVIT

STATE OF WASHINGTON )  
 )  
 )  
COUNTY OF BENTON )

Subject: WNP-2, Operating License NPF-21  
Request for Amendment Technical  
Specification Surveillance  
Requirement SR 3.6.1.3.8  
(Additional Information)

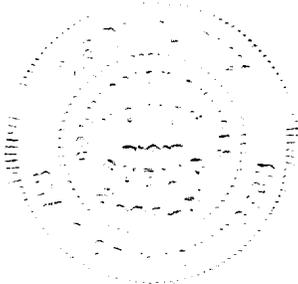
I, P.J. Inserra, being duly sworn, subscribe to and say that I am the (Acting) Manager, Regulatory Affairs, for ENERGY NORTHWEST, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief that the statements made in it are true.

DATE October 12, 2000

P.J. Inserra  
PJ Inserra  
(Acting) Manager, Regulatory Affairs

On this date personally appeared before me P.J. Inserra, 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 12 day of October 2000.



Len A. May  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Benton County

My Commission Expires 3-29-01

**REQUEST FOR AMENDMENT  
TECHNICAL SPECIFICATION SR 3.6.1.3.8  
(ADDITIONAL INFORMATION)**

Attachment  
Page 1 of 2

**Request for Additional Information Question # 1**

*Page 2 of the May 11, 2000, submittal states that the excess flow check valves have no active safety function and as such are not subject to inservice testing. Therefore, an inservice relief request in accordance with 10 CFR 50.55a is not required. Please provide detailed justification for this statement. If you do not wish to justify this statement, then remove the statement and submit a relief request.*

**Response to Request for Additional Information Question #1**

Energy Northwest will revise our request of May 11, 2000, and submit a relief request to perform alternate inservice testing (IST) pursuant to 10 CFR 50.55a(a)(3)(i). The alternate IST testing will consist of testing a representative sample of reactor instrument line EFCVs every refueling outage such that all reactor instrument line EFCVs are tested at least once every 10 years (nominal) in accordance with the proposed Technical Specification SR 3.6.1.3.8.

**REQUEST FOR AMENDMENT  
TECHNICAL SPECIFICATION SR 3.6.1.3.8  
(ADDITIONAL INFORMATION)**

Attachment  
Page 2 of 2

**Request for Additional Information Question # 2**

*Provide a discussion on the vulnerability of instrument lines and equipment and any operational impact an instrument line break may have (jet impingement, separation criteria).*

**Response to Request for Additional Information Question #2**

The WNP-2 reactor instrument lines are designed and installed in compliance with Regulatory Guide 1.11 Subsection C, NRC Position 1.d. The instrument piping is constructed in accordance with the ASME Code Section III, 1974 Edition with Addenda through the Winter of 1975. Materials for these 1" and 3/4" diameter instrumentation lines are stainless steel schedule 80 SA-312 type 304 with fittings of compatible material and rating. The instrument piping and supports are designed for seismic category 1 loads.

The process instrument lines up to the excess flow check valves pass through containment via instrument penetrations that separate and protect the lines. The excess flow check valves are located as near as practical to the penetration. The lines pass through the penetrations in a cluster and are protected from accidental damage by the robust design of the 1" and 3/4" schedule 80 stainless steel pipe.

The process instrument lines are typically separated by division as they are routed through penetrations out of the primary containment. Thus failure of one line will not impact the corresponding redundant division's instrument line. In addition, SRP 3.6.1 (BTP ASB 3-1) does not require consideration of breaks or cracks in piping having a 1" nominal diameter or less. Instrument lines connected to the reactor pressure vessel are 1" or 3/4" diameter pipes and thus are not postulated to break or crack as part of the accident analysis. Leaks or sprays from a failed instrument line in the area of a containment penetration would not cause failure of the other instrument lines near the penetration since the piping design is robust in nature, i.e., the piping is typically schedule 80 stainless steel designed to seismic category 1 requirements.

The structural integrity of the reactor instrument lines is verified during completion of the Reactor Pressure Vessel Leakage Test that is conducted at the end of every refuel outage. The surveillance procedure requires visual inspection for leakage of reactor instrument lines that penetrate the containment up to and including the excess flow check valves.