



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

May 25, 1989

Docket No. 50-397

Mr. G. C. Sorensen
Manager Regulatory Programs
Washington Public Power Supply System
P.O. Box 968
3000 George Washington Way
Richland, Washington 99352

Dear Mr. Sorensen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 67 TO FACILITY OPERATING LICENSE
NO. NPF-21 - WPPSS NUCLEAR PROJECT NO. 2 (TAC NO. 64655)

The U.S. Nuclear Regulatory Commission has issued the enclosed amendment to Facility Operating License NPF-21 to the Washington Public Power Supply System for WPPSS Nuclear Project No. 2, located in Benton County near Richland, Washington. This amendment is in response to your letter dated February 10, 1987 (G02-87-046) and supplement dated March 31, 1989 (G02-89-050).

This amendment revises license condition 2.C.(14) to incorporate the standard condition for fire protection set forth in Generic Letter 86-10. It removes Sections 3/4.3.7.9, 3/4.7.6, 3/4.7.7, and 6.2.2.e from the WNP-2 Technical Specifications. It also modifies the Bases sections and the Index of the Technical Specifications to reflect the above changes.

With this amendment in effect, you may alter specific features of the approved program provided (a) such changes do not otherwise involve a change in a license condition or technical specification or result in an unreviewed safety condition (see 10 CFR 50.59), and (b) such changes do not result in failure to complete the fire protection program as approved by the Commission. As with other changes implemented under 10 CFR 50.59, you shall maintain, in auditable form, a current record of all such changes, including an analysis of the effects of the change on the fire protection program, and shall make such records available to NRC inspectors upon request. All changes to the approved program shall be reported annually to the Director of the Office on Nuclear Reactor Regulation, along with the FSAR revisions required by 10 CFR 50.71(e).

Temporary changes to specific fire protection features which may be necessary to accomplish maintenance or modifications are acceptable provided interim compensatory measures are implemented. Issuance of this amendment is predicated on your incorporation of the fire protection program into the FSAR.

cp1

May 25, 1989

The approved fire protection program consists of Section 9.5.1 and Appendix F of the FSAR as revised through Amendment No. 39. It also includes pertinent material in all other sections of the FSAR referenced in either Section 9.5.1 or Appendix F. By separate letter we have advised you of our approval of the fire protection program as currently in the FSAR. We understand that you have already incorporated into the FSAR, or will do so in the next annual update, any revisions to the fire protection program implicit in your correspondence regarding issues raised in our letter to you dated November 11, 1987. We also understand that you will revise either Section 9.5.1 or Appendix F to include reference to Sections 13.1.2.3.4, Shift Fire Brigade, and 3.1.2.1.3, Criterion 3 - Fire Protection.

A copy of the related safety evaluation supporting the amendment is enclosed. A Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,

S/

Robert B. Samworth, Senior Project Manager
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 67 to Facility
Operating License No. NPF-21
2. Safety Evaluation

cc: w/enclosures
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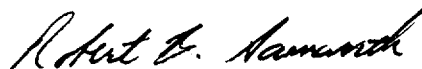
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May 25, 1989

The approved fire protection program consists of Section 9.5.1 and Appendix F of the FSAR as revised through Amendment No. 39. It also includes pertinent material in all other sections of the FSAR referenced in either Section 9.5.1 or Appendix F. By separate letter we have advised you of our approval of the fire protection program as currently in the FSAR. We understand that you have already incorporated into the FSAR, or will do so in the next annual update, any revisions to the fire protection program implicit in your correspondence regarding issues raised in our letter to you dated November 11, 1987. We also understand that you will revise either Section 9.5.1 or Appendix F to include reference to Sections 13.1.2.3.4, Shift Fire Brigade, and 3.1.2.1.3, Criterion 3 - Fire Protection.

A copy of the related safety evaluation supporting the amendment is enclosed. A Notice of Issuance will be included in the Commission's bi-weekly Federal Register notice.

Sincerely,



Robert B. Samworth, Senior Project Manager
Project Directorate V
Division of Reactor Projects III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

Enclosures:

1. Amendment No. 67 to Facility
Operating License No. NPF-21
2. Safety Evaluation

cc: w/enclosures
See next page

Mr. G. C. Sorensen

WPPSS Nuclear Project No. 2
(WNP-2)

cc:

Mr. G. C. Sorensen, Manager
Regulatory Programs
Washington Public Power Supply System
P.O. Box 968
3000 George Washington Way
Richland, Washington 99352

Regional Administrator, Region V
U.S. Nuclear Regulatory Commission
1450 Maria Lane, Suite 210
Walnut Creek, California 94596

Mr. G. E. Doupe, Esquire
Washington Public Power Supply System
P. O. Box 968
3000 George Washington Way
Richland, Washington 99352

Chairman
Benton County Board of Commissioners
Prosser, Washington 99350

Mr. Curtis Eschels, Chairman
Energy Facility Site Evaluation Council
Mail Stop PY-11
Olympia, Washington 98504

Mr. Christian Bosted
U. S. Nuclear Regulatory Commission
P. O. Box 69
Richland, Washington 99352

Mr. Alan G. Hosler, Licensing Manager
Washington Public Power Supply System
P. O. Box 968, MD 956B
Richland, Washington 99352

Nicholas S. Reynolds, Esq.
Bishop, Cook, Purcell
& Reynolds
1400 L Street NW
Washington, D.C. 20005-3502

Mr. A. Lee Oxsen
Assistant Managing Director for Operations
Washington Public Power Supply System
P. O. Box 968, MD 1023
Richland, Washington 99352

Mr. Gary D. Bouchey, Director
Licensing and Assurance
Washington Public Power Supply System
P. O. Box 968, MD 280
Richland, Washington 99352

Mr. C. M. Powers
WNP-2 Plant Manager
Washington Public Power Supply System
P. O. Box MD 927M
Richland, Washington 99352



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

DOCKET NO. 50-397

NUCLEAR PROJECT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 67
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission or the NRC) has found that:
 - A. The application for amendment filed by the Washington Public Power Supply System (the licensee), dated February 10, 1987 and supplement dated March 31, 1989 comply with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations set forth in 10 CFR Chapter I;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the Operating License and the Technical Specifications are amended as indicated below and in the attachment to this license amendment. Paragraph 2.C.(14) of Facility Operating License No. NPF-21 is hereby amended to read as follows:

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PDR ADOCK 05000397
P PIC

(14) Fire Protection Program (Generic Letter 86-10)

The licensee shall implement and maintain in effect all provisions of the approved fire protection program as described in Section 9.5.1 and Appendix F of the Final Safety Analysis Report (FSAR) for the facility thru Amendment #39 and as described in subsequent letters to the staff through November 30, 1988, referenced in the May 22, 1989 safety evaluation and in other pertinent sections of the FSAR referenced in either Section 9.5.1 or Appendix F and as approved in the Safety Evaluation Report issued in March 1982 (NUREG 0892) and in Supplements 3, issued in May 1983, and 4, issued in December 1983, and in safety evaluations issued with letters dated November 11, 1987 and May 22, 1989 subject to the following provision:

The licensee may make changes to the approved fire protection program without prior approval of the Commission only if those changes would not adversely affect the ability to achieve and maintain safe shutdown in the event of a fire.

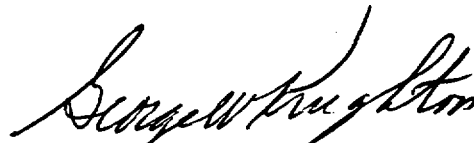
3. Paragraph 2.C.(2) of Facility Operating License No. NPF-21 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 67, and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

4. This amendment is effective as of the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



George W. Knighton, Director
Project Directorate V
Division of Reactor Projects III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: May 25, 1989

ENCLOSURE TO LICENSE AMENDMENT NO. 67

FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Appendix "A" Technical Specifications with the enclosed pages. The revised pages are identified by Amendment number and contain vertical lines indicating the areas of change. Also to be replaced are the following overleaf pages.

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

- b. Stored sources not in use - Each sealed source and fission detector shall be tested prior to use or transfer to another licensee unless tested within the previous 6 months. Sealed sources and fission detectors transferred without a certificate indicating the last test date shall be tested prior to being placed into use.
- c. Startup sources and fission detectors - Each sealed startup source and fission detector shall be tested within 31 days prior to being subjected to core flux or installed in the core and following repair or maintenance to the source.

4.7.5.3 Reports - A report shall be prepared and submitted to the Commission on an annual basis if sealed source or fission detector leakage tests reveal the presence of greater than or equal to 0.005 microcurie of removable contamination.

PLANT SYSTEMS

3/4.7.8 AREA TEMPERATURE MONITORING

LIMITING CONDITION FOR OPERATION

3.7.8 The temperature of each area shown in Table 3.7.8-1 shall be maintained within the limits indicated in Table 3.7.8-1.

APPLICABILITY: Whenever the equipment in an affected area is required to be OPERABLE.

ACTION:

With one or more areas exceeding the temperature limit(s) shown in Table 3.7.8-1:

- a. For more than 8 hours, in lieu of any report required by Specification 6.9.1, prepare and submit a Special Report to the Commission pursuant to Specification 6.9.2 within the next 30 days providing a record of the amount by which and the cumulative time the temperature in the affected area exceeded its limit and an analysis to demonstrate the continued OPERABILITY of the affected equipment.
- b. By more than 30°F, in addition to the Special Report required above, within 4 hours either restore the area to within its temperature limit or declare the equipment in the affected area inoperable.

SURVEILLANCE REQUIREMENTS

4.7.8 The temperature in each of the areas shown in Table 3.7.8-1 shall be determined to be within its limit at least once per 12 hours.

TABLE 3.7.8-1

AREA TEMPERATURE MONITORING

<u>AREA</u>	<u>TEMPERATURE LIMIT (°F)</u>
a. Control Room	< 104
b. Auxiliary Electric Equip. Rooms	< 104
c. Primary Containment (Drywell)	< 150
d. HPCS, LPCS, RHR, RCIC Rooms	< 150
e. Primary Containment Beneath Reactor Pressure Vessel	< 165
f. Switchgear Rooms	< 104

PLANT SYSTEMS

3/4.7.9 MAIN TURBINE BYPASS SYSTEM

LIMITING CONDITION FOR OPERATION

3.7.9 The main turbine bypass system shall be OPERABLE.

APPLICABILITY: OPERATIONAL CONDITION 1 when THERMAL POWER is greater than or equal to 25% of RATED THERMAL POWER.

ACTION: With the main turbine bypass system inoperable, restore the system to OPERABLE status within 1 hour or reduce THERMAL POWER to less than 25% of RATED THERMAL POWER within the next 4 hours.

SURVEILLANCE REQUIREMENTS

4.7.9 The main turbine bypass system shall be demonstrated OPERABLE at least once per:

- a. 7 days by cycling each turbine bypass valve through at least one complete cycle of full travel, and
- b. 18 months by:
 1. Performing a system functional test which includes simulated automatic actuation and verifying that each automatic valve actuates to its correct position.
 2. Performing a CHANNEL CALIBRATION of the main turbine bypass system actuation instrumentation.
 3. Demonstrating TURBINE BYPASS SYSTEM RESPONSE TIME to be less than or equal to 300 milliseconds to a valve position equivalent to 80% of rated bypass flow.

INSTRUMENTATION

BASES

MONITORING INSTRUMENTATION (Continued)

3/4.3.7.3 METEOROLOGICAL MONITORING INSTRUMENTATION

The OPERABILITY of the meteorological monitoring instrumentation ensures that sufficient meteorological data are available for estimating potential radiation doses to the public as a result of routine or accidental release of radioactive materials to the atmosphere. This capability is required to evaluate the need for initiating protective measures to protect the health and safety of the public. This instrumentation is consistent with the recommendations of Regulatory Guide 1.23, "Onsite Meteorological Programs," February, 1972.

3/4.3.7.4 REMOTE SHUTDOWN MONITORING INSTRUMENTATION

The OPERABILITY of the remote shutdown monitoring instrumentation ensures that sufficient capability is available to permit shutdown and maintenance of HOT SHUTDOWN of the unit from locations outside of the control room. This capability is required in the event control room habitability is lost and is consistent with General Design Criterion 19 of Appendix A to 10 CFR Part 50.

3/4.3.7.5 ACCIDENT MONITORING INSTRUMENTATION

The OPERABILITY of the accident monitoring instrumentation ensures that sufficient information is available on selected plant parameters to monitor and assess important variables following an accident. This capability is consistent with the recommendations of Regulatory Guide 1.97, "Instrumentation for Light Water Cooled Nuclear Power Plants to Assess Plant Conditions During and Following an Accident," December 1975 and NUREG-0737, "Clarification of TMI Action Plan Requirements," November 1980.

3/4.3.7.6 SOURCE RANGE MONITORS

The source range monitors provide the operator with information of the status of the neutron level in the core at very low power levels during startup and shutdown. At these power levels, reactivity additions shall not be made without this flux level information available to the operator. When the intermediate range monitors are on scale, adequate information is available without the SRMs and they can be retracted.

3/4.3.7.7 TRAVERSING IN-CORE PROBE SYSTEM

The OPERABILITY of the traversing in-core probe system with the specified minimum complement of equipment ensures that the measurements obtained from use of this equipment accurately represent the spatial neutron flux distribution of the reactor core.

INSTRUMENTATION

BASES

MONITORING INSTRUMENTATION (Continued)

3/4.3.7.9 LOOSE-PART DETECTION SYSTEM

The OPERABILITY of the loose-part detection system ensures that sufficient capability is available to detect loose metallic parts in the primary system and avoid or mitigate damage to primary system components. The allowable out-of-service times and surveillance requirements are consistent with the recommendations of Regulatory Guide 1.133, "Loose-Part Detection Program for the Primary System of Light-Water-Cooled Reactors," May 1981.

3/4.3.7.10 RADIOACTIVE LIQUID EFFLUENT MONITORING INSTRUMENTATION

The radioactive liquid effluent instrumentation is provided to monitor and control, as applicable, the releases of radioactive materials in liquid effluents during actual or potential releases of liquid effluents. The alarm/trip setpoints for these instruments shall be calculated and adjusted in accordance with the methodology and parameters in the ODCM to ensure that the alarm/trip will occur prior to exceeding the limits of 10 CFR Part 20. The OPERABILITY and use of this instrumentation is consistent with the requirements of General Design Criteria 60, 63, and 64 of Appendix A to 10 CFR Part 50. The purpose of tank level indicating devices is to assure the detection and control of leaks that if not controlled could potentially result in the transport of radioactive materials to UNRESTRICTED AREAS.

PLANT SYSTEMS

BASES

3/4.7.4 SNUBBERS (Continued)

failures and initiating events is constant with time and that the failure of any snubber on that system could cause the system to be unprotected and to result in failure during an assumed initiating event. Inspections performed before that interval has elapsed may be used as a new reference point to determine the next inspection. However, the results of such early inspections performed before the original required time interval has elapsed, (nominal time less 25%) may not be used to lengthen the required inspection interval. Any inspection whose results require a shorter inspection interval will override the previous schedule.

The acceptance criteria are to be used in the visual inspection to determine OPERABILITY of the snubbers. For example, if a fluid port of a hydraulic snubber is found to be uncovered, the snubber shall be declared inoperable and shall not be determined OPERABLE via functional testing.

To provide assurance of snubber functional reliability, one of two functional testing methods are used with the stated acceptance criteria:

1. Functionally test 10% of a type of snubber with an additional 5% tested for each functional testing failure, or
2. Functionally test a sample size and determine sample acceptance or continue testing using Figure 4.7-1.

PLANT SYSTEMS

BASES

SNUBBERS (Continued)

Figure 4.7-1 was developed using "Wald's Sequential Probability Ratio Plan" as described in "Quality Control and Industrial Statistics" by Acheson J. Duncan.

Permanent or other exemptions from the surveillance program for individual snubbers may be granted by the Commission if a justifiable basis for exemption is presented and, if applicable, snubber life destructive testing was performed to qualify the snubbers for the applicable design conditions at either the completion of their fabrication or at a subsequent date. Snubbers so exempted shall be listed in the list of individual snubbers indicating the extent of the exemptions.

The service life of a snubber is established via manufacturer input and information through consideration of the snubber service conditions and associated installation and maintenance records (newly installed snubbers, seal replaced, spring replaced, in high radiation area, in high temperature area, etc.). The requirement to monitor the snubber service life is included to ensure that the snubbers periodically undergo a performance evaluation in view of their age and operating conditions. These records will provide statistical bases for future consideration of snubber service life.

3/4.7.5 SEALED SOURCE CONTAMINATION

The limitations on removable contamination for sources requiring leak testing, including alpha emitters, is based on 10 CFR 70.39(c) limits for plutonium. This limitation will ensure that leakage from byproduct, source, and special nuclear material sources will not exceed allowable intake values. Sealed sources are classified into three groups according to their use, with surveillance requirements commensurate with the probability of damage to a source in that group. Those sources which are frequently handled are required to be tested more often than those which are not. Sealed sources which are continuously enclosed within a shielded mechanism, i.e., sealed sources within radiation monitoring devices, are considered to be stored and need not be tested unless they are removed from the shielded mechanism.

3/4.7.8 AREA TEMPERATURE MONITORING

The area temperature limitations ensure that safety-related equipment will not be subjected to temperatures in excess of their environmental qualification temperatures. Exposure to excessive temperatures may degrade equipment and can cause loss of its OPERABILITY.

3/4.7.9 MAIN TURBINE BYPASS SYSTEM

The main turbine bypass system is required to be OPERABLE consistent with the assumptions of the feedwater controller failure analysis of the cycle specific analysis. The main turbine bypass system provides pressure relief during the feedwater controller failure event so that the safety limit MCPR is not violated.

6.0 ADMINISTRATIVE CONTROLS

6.1 RESPONSIBILITY

6.1.1 The Plant Manager shall be responsible for overall unit operation and shall delegate in writing the succession to this responsibility during his absence.

6.1.2 The Shift Manager (or during his absence from the control room, a designated individual) shall be responsible for the control room command function. A management directive to this effect, signed by the Director of Power Generation shall be reissued to all station personnel on an annual basis.

6.2 ORGANIZATION

6.2.1 OFFSITE AND ONSITE ORGANIZATIONS

Onsite and offsite organizations shall be established for unit operation and corporate management, respectively. The onsite and offsite organizations shall include the positions for activities affecting the safety of the nuclear power plant.

- a. Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental responsibilities and relationships, and job descriptions for key personnel positions. These requirements are documented in the WNP-2 FSAR and updated in accordance with 10 CFR 50.71.
- b. The Plant Manager shall be responsible for overall unit safe operation and shall have control over those onsite activities necessary for safe operation and maintenance of the plant.
- c. The Assistant Managing Director for Operations shall have corporate responsibility for overall plant nuclear safety and shall take any measures needed to ensure acceptable performance of the staff in operating, maintaining, and providing technical support to the plant to ensure nuclear safety.
- d. The individuals who train the operating staff and those who carry out health physics functions may report to the appropriate onsite manager; however, they shall have sufficient organizational freedom to ensure their independence from operating pressures.
- e. The organization responsible for the overall quality assurance functions shall report to the Supply System Managing Director.

6.2.2 UNIT STAFF

- a. Each on duty shift shall be composed of at least the minimum shift crew composition shown in Table 6.2.2-1;

ADMINISTRATIVE CONTROLS

UNIT STAFF (continued)

- b. At least one licensed Operator shall be in the control room when fuel is in the reactor. In addition, while the unit is in OPERATIONAL CONDITION 1, 2, or 3, at least one licensed Senior Operator shall be in the control room.
- c. A Health Physics Technician* shall be on site when fuel is in the reactor and at least one fully qualified chemistry technician shall be on site in OPERATIONAL CONDITION 1, 2, or 3;
- d. All CORE ALTERATIONS shall be observed and directly supervised by either a licensed Senior Operator or licensed Senior Operator Limited to Fuel Handling who has no other concurrent responsibilities during this operation;
- e. Administrative procedures shall be developed and implemented to limit the working hours of unit staff who perform safety-related functions e.g., licensed Senior Operators, licensed Operators, health physicists, chemistry technicians, auxiliary operators, and key maintenance personnel.

Adequate shift coverage shall be maintained without routine heavy use of overtime. The objective shall be to have operating personnel work a normal 8-hour day, 40-hour week while the unit is operating. However, in the event that unforeseen problems require substantial amounts of overtime to be used, or during extended periods of shut-down for refueling, major maintenance, or major unit modifications, on a temporary basis the following guidelines shall be followed:

- 1. An individual should not be permitted to work more than 16 hours straight, excluding shift turnover time.
- 2. An individual should not be permitted to work more than 16 hours in any 24-hour period, nor more than 24 hours in any 48-hour period, nor more than 72 hours in any 7-day period, all excluding shift turnover time.
- 3. A break of at least 8 hours should be allowed between work periods, including shift turnover time.

*The Health Physics Technician and fire brigade composition may be less than the minimum requirements for a period of time not to exceed 2 hours, in order to accommodate unexpected absence, provided immediate action is taken to fill the required positions.

ADMINISTRATIVE CONTROLS

UNIT STAFF (continued)

4. Except during extended shutdown periods, the use of overtime should be considered on an individual basis and not for the entire staff on a shift.

Any deviation from the above guidelines shall be authorized by the Plant Manager or his deputy, or higher levels of management, in accordance with established procedures and with documentation of the basis for granting the deviation. Controls shall be included in the procedures such that individual overtime shall be reviewed monthly by the Plant Manager or his designee to assure that excessive hours have not been assigned. Routine deviation from the above guidelines is not authorized.

- f. The Operations Manager, Assistant Operations Manager, Shift Managers and Control Room Supervisors shall hold a senior reactor operator license. The Reactor Operators shall hold either a senior reactor operator license or a reactor operator license.

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO. 67 TO FACILITY OPERATING LICENSE NO. NPF-21
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated February 10, 1987 (G02-87-046), Washington Public Power Supply System ("licensee") proposed that the existing license condition on fire protection be replaced with the standard condition noted in Generic Letter 86-10. In that letter certain changes to the Technical Specifications for Nuclear Project No. 2 were also proposed. The proposed changes would remove requirements for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements as recommended by Generic Letter 86-10. The proposed changes also would modify the administrative control requirements of the technical specifications to add requirements for the fire protection program that are similar to requirements for other programs implemented by license condition.

Guidance for the preparation of an amendment request to make these proposed changes was provided to all power reactor licensees by Generic Letter 88-12, dated August 2, 1988. On March 31, 1989 the licensee modified the license amendment application consistent with Generic Letter 88-12.

2.0 BACKGROUND

Following the fire at the Browns Ferry Nuclear Power Plant on March 22, 1975, the Commission undertook a number of actions to ensure that improvements were implemented in the fire protection programs for all power reactor facilities. Because of the extensive modification of fire protection programs and the number of open issues resulting from staff evaluations, a number of revisions occurred in these programs over the years. Consequently, licensees were requested by Generic Letter 86-10 to incorporate the final NRC approved fire protection program in their Final Safety Analysis Reports (FSARs). In this manner, the fire protection program -- including the systems, the administrative and technical controls, the organization, and other plant features associated with fire protection -- would have a status consistent with that of other plant features described in the FSAR. In addition, the Commission concluded that a standard license condition, requiring compliance with the provisions of the fire protection program as described in the FSAR, should be used to ensure uniform enforcement of fire protection requirements. Finally, the Commission stated that

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with the requested actions, licensees may request an amendment to delete the fire protection technical specifications that would now be unnecessary.

The licensees for the Calloway and Wolf Creek plants submitted lead plant proposals to remove fire protection requirements from their technical specifications. These actions were an industry effort to obtain NRC guidance on an acceptable format for license amendment requests to remove fire protection requirements from technical specifications.

Additionally, in the licensing review of new plants, the staff has approved applicant requests to remove fire protection requirements from technical specifications issued with the operating license. Thus, on the basis of the lead plant proposals and the staff's experience with new licenses, Generic Letter 88-12 was issued to provide guidance on removing fire protection requirements from technical specifications.

3.0 EVALUATION

Generic Letter 86-10 recommended the removal of fire protection requirements from the technical specifications. Although a comprehensive fire protection program is essential to plant safety, the basis for this recommendation is that many details of this program currently addressed in the technical specifications can be modified without affecting nuclear safety. Such modifications can be made provided that there are suitable administrative controls over these changes. These details, which are presently included in the technical specifications and are removed by this amendment, do not constitute performance requirements necessary to ensure safe operation of the facility and, therefore, do not warrant being included in the technical specifications. At the same time, suitable administrative controls ensure that there will be careful review and analysis by competent individuals of any changes in the fire protection program including those technical and administrative requirements removed from the technical specifications to ensure that nuclear safety is not adversely affected. These controls include: (1) the technical specifications administrative controls that are applicable to the fire protection program; (2) the license condition on implementation of, and subsequent changes to, the fire protection program, and (3) the 10 CFR Part 50.59 criteria for evaluating changes to the fire protection program as described in the FSAR.

The specific details relating to fire protection requirements removed from technical specifications by this amendment include those specifications for fire detection systems, fire suppression systems, fire barriers, and fire brigade staffing requirements. The administrative control requirements have been modified to include fire protection program implementation as an element for which written procedures must be established, implemented and maintained. In addition, the audit responsibilities of the Plant Operations Committee were expanded to include the review of the fire protection program and implementing procedures and submittal of recommended changes to the Corporate Nuclear Safety Review Group.

The Technical Specification changes proposed by the licensee are in accordance with the guidance provided by Generic Letter 88-12 as addressed in the items below.

- (1) Specification 3/4.3.7.9, "Fire Detection Instrumentation," its associated Surveillance Requirements, and its bases were proposed to be removed.
- (2) Specification 3/4.7.6, "Fire Suppression Systems," its associated Surveillance Requirements, and Bases were proposed to be removed.
- (3) Specification 3/4.7.7, "Fire Rated Assemblies" (fire barriers), its associated Surveillance Requirements, and Bases were proposed to be removed.
- (4) Specification 6.2.2.e on fire brigade staffing requirements was proposed to be removed.

Specification 6.5.1.6 concerning the Plant Operations Committee already includes the review of the fire protection program implementation. Minutes of the POC are provided to the Corporate Nuclear Safety Review Board (CNSRB). The CNSRB has specific audit responsibilities for fire protection.

Specification 6.8, "Procedures and Programs," already includes fire protection program implementation among those programs for which written procedures shall be established, implemented, and maintained.

As required by Generic Letter 86-10, the licensee confirmed that the NRC-approved fire protection program has been incorporated into the FSAR. Specifically the WNP-2 fire protection program includes Section 9.5.1 and Appendix F of the FSAR and other sections of the FSAR related to fire protection referenced in Section 9.5.1 or in Appendix F. The licensee has also proposed that the existing license condition on the fire protection program be replaced with the standard condition noted in Generic Letter 86-10.

The licensee confirmed that the operational conditions, remedial actions, and test requirements associated with the removed fire protection technical specifications have been included in the fire protection program incorporated into the FSAR. This is in accordance with the guidance of Generic Letter 88-12. Therefore, the staff finds the proposed changes acceptable.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in surveillance requirements and a change in the installation and use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that this amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding (54 FR 15839, April 19, 1989) that this amendment involves no significant hazards consideration and there has been no public

comment on such finding. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9) and 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONTACT WITH STATE OFFICIAL

The Commission made a proposed determination that the amendment involves no significant hazards consideration and consulted with the State of Washington. No public comments were received, and the State of Washington did not have any comment.

6.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, and (2) such activities will be conducted in compliance with the Commission's regulations and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributors: Dennis J. Kubicki, SPLB/DEST
Thomas G. Dunning, OTSB/DOEA
Robert B. Samworth, PD5/DRSP

Dated: May 25, 1989