

April 26, 1990

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

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Dear Mr. Sorensen:

SUBJECT: ISSUANCE OF AMENDMENT NO. 82 TO FACILITY OPERATING LICENSE
NO. NPF-21 - WPPSS NUCLEAR PROJECT NO. 2 (TAC NO. 75221)

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 October 27, 1989 (G02-89-200).

This amendment revises Surveillance Requirement 4.0.2 by deleting the general requirement that the combined time interval for any three consecutive surveillance intervals shall not exceed 3.25 times the specified surveillance interval. The corresponding bases section is revised to set forth the basis for ensuring that surveillances are performed in a timely manner.

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,

ORIGINAL SIGNED BY R. SAMWORTH

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. 82 to Facility Operating License No. NPF-21
2. Safety Evaluation

cc w/enclosures:
See next page

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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555
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Regulatory Programs
Washington Public Power Supply System
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Sincerely,

A handwritten signature in cursive script that reads "Robert B. Samworth".

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. 82 to Facility
Operating License No. NPF-21
2. Safety Evaluation

cc w/enclosures:
See next page

Mr. G. C. Sorensen, Manager
Washington Public Power Supply System

WPPSS Nuclear Project No. 2
(WNP-2)

cc:

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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. 82
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 October 27, 1989 complies 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.

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2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and 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. 82, 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.

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

FOR THE NUCLEAR REGULATORY COMMISSION



John T. Larkins, Acting Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects

Attachment:
Changes to the Technical
Specifications

Date of Issuance: April 26, 1990

ENCLOSURE TO LICENSE AMENDMENT NO. 82

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.

AMENDMENT PAGE

3/4 0-2

B 3/4 0-2

OVERLEAF PAGE

3/4 0-1

B 3/4 0-1

3/4.0 APPLICABILITY

LIMITING CONDITION FOR OPERATION

3.0.1 Compliance with the Limiting Conditions for Operation contained in the succeeding Specifications is required during the OPERATIONAL CONDITIONS or other conditions specified therein; except that upon failure to meet the Limiting Conditions for Operation, the associated ACTION requirements shall be met.

3.0.2 Noncompliance with a Specification shall exist when the requirements of the Limiting Condition for Operation and associated ACTION requirements are not met within the specified time intervals. If the Limiting Condition for Operation is restored prior to expiration of the specified time intervals, completion of the Action requirements is not required.

3.0.3 When a Limiting Condition for Operation is not met, except as provided in the associated ACTION requirements, within one hour action shall be initiated to place the unit in an OPERATIONAL CONDITION in which the Specification does not apply by placing it, as applicable, in:

1. At least STARTUP within the next 6 hours,
2. At least HOT SHUTDOWN within the following 6 hours, and
3. At least COLD SHUTDOWN within the subsequent 24 hours.

Where corrective measures are completed that permit operation under the ACTION requirements, the ACTION may be taken in accordance with the specified time limits as measured from the time of failure to meet the Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications.

This specification is not applicable in OPERATIONAL CONDITION 4 or 5.

3.0.4 Entry into an OPERATIONAL CONDITION or other specified condition shall not be made unless the conditions for the Limiting Condition for Operation are met without reliance on provisions contained in the ACTION requirements. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements. Exceptions to these requirements are stated in the individual Specifications.

APPLICABILITY

SURVEILLANCE REQUIREMENTS

- 4.0.1 Surveillance Requirements shall be met during the OPERATIONAL CONDITIONS or other conditions specified for individual Limiting Conditions for Operation unless otherwise stated in an individual Surveillance Requirement.
- 4.0.2 Each Surveillance Requirement shall be performed within the specified Surveillance interval with a maximum allowable extension not to exceed 25% of the specified surveillance interval.
- 4.0.3 Failure to perform a Surveillance Requirement within the specified time interval shall constitute a failure to meet the OPERABILITY requirements for a Limiting Condition for Operation. Exceptions to these requirements are stated in the individual Specifications. Surveillance requirements do not have to be performed on inoperable equipment.
- 4.0.4 Entry into an OPERATIONAL CONDITION or other specified applicable condition shall not be made unless the Surveillance Requirement(s) associated with the Limiting Condition for Operation have been performed within the applicable surveillance interval or as otherwise specified.
- 4.0.5 Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, & 3 components shall be applicable as follows:

- a. Inservice inspection of ASME Code Class 1, 2, and 3 components and inservice testing of ASME Code Class 1, 2, and 3 pumps and valves shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50, Section 50.55a(g), except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g) (6) (i).
- b. Surveillance intervals specified in Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda for the inservice inspection and testing activities required by the ASME Boiler and Pressure Vessel Code and applicable Addenda shall be applicable as follows in these Technical Specifications:

ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities

Required frequencies for performing inservice inspection and testing activities

Weekly	At least once per 7 days
Monthly	At least once per 31 days
Quarterly or every 3 months	At least once per 92 days
Semiannually or every 6 months	At least once per 184 days
Every 9 months	At least once per 276 days
Yearly or annually	At least once per 366 days

3/4.0 APPLICABILITY

BASES

The specifications of this section provide the general requirements applicable to each of the Limiting Conditions for Operation and Surveillance Requirements within Section 3/4.

3.0.1 This specification states the applicability of each specification in terms of defined OPERATIONAL CONDITION or other specified applicability condition and is provided to delineate specifically when each specification is applicable.

3.0.2 This specification defines those conditions necessary to constitute compliance with the terms of an individual Limiting Condition for Operation and associated ACTION requirement.

3.0.3 This specification delineates the measures to be taken for those circumstances not directly provided for in the ACTION statements and whose occurrence would violate the intent of the specification. For example, Specification 3.7.2 requires two control room emergency filtration subsystems to be OPERABLE and provides explicit ACTION requirements if one subsystem is inoperable. Under the requirements of Specification 3.0.3, if both of the required subsystems are inoperable, within one hour measures must be initiated to place the unit in at least STARTUP within the next 6 hours, in at least HOT SHUTDOWN within the following 6 hours and in COLD SHUTDOWN within the subsequent 24 hours. As a further example, Specification 3.6.6.1 requires two primary containment hydrogen recombiner systems to be OPERABLE and provides explicit ACTION requirements if one recombiner system is inoperable. Under the requirements of Specification 3.0.3, if both of the required systems are inoperable, within one hour measures must be initiated to place the unit in at least STARTUP within the next 6 hours and in at least HOT SHUTDOWN within the following 6 hours.

3.0.4 This specification provides that entry into an OPERATIONAL CONDITION must be made with (a) the full complement of required systems, equipment or components OPERABLE and (b) all other parameters as specified in the Limiting Conditions for Operation being met without regard for allowable deviations and out of service provisions contained in the ACTION statements.

The intent of this provision is to ensure that unit operation is not initiated with either required equipment or systems inoperable or other limits being exceeded.

Exceptions to this provision have been provided for a limited number of specifications when startup with inoperable equipment would not affect plant safety. These exceptions are stated in the ACTION statements of the appropriate specifications.

APPLICABILITY

BASES

4.0.1 This specification provides that surveillance activities necessary to ensure the Limiting Conditions for Operation are met and will be performed during the OPERATIONAL CONDITIONS or other conditions for which the Limiting Conditions for Operation are applicable. Provisions for additional surveillance activities to be performed without regard to the applicable OPERATIONAL CONDITIONS or other conditions are provided in the individual Surveillance Requirements. Surveillance Requirements for Special Test Exceptions need only be performed when the Special Test Exception is being utilized as an exception to an individual specification.

4.0.2 The provisions of this specification establish the limit for which the specified time interval for Surveillance Requirements may be extended. It permits an allowable extension of the normal surveillance interval to facilitate surveillance scheduling and consideration of plant operating conditions that may not be suitable for conducting the surveillance; e.g., transient conditions or other ongoing surveillance or maintenance activities. It also provides flexibility to accommodate the length of a fuel cycle for surveillances that are performed at each refueling outage and are specified with an 18 month surveillance interval. It is not intended that this provision be used repeatedly as a convenience to extend surveillance intervals beyond that specified for surveillances that are not performed during refueling outages. The limitation of Specification 4.0.2 is based on engineering judgement and the recognition that the most probable result of any particular surveillance being performed is the verification of conformance with the Surveillance Requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

The tolerance values, taken either individually or consecutively over 3 test intervals, are sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

4.0.3 The provisions of this specification set forth the criteria for determination of compliance with the OPERABILITY requirements of the Limiting Conditions for Operation. Under this criteria, equipment, systems or components are assumed to be OPERABLE if the associated surveillance activities have been satisfactorily performed within the specified time interval. Nothing in this provision is to be construed as defining equipment, systems or components OPERABLE, when such items are found or known to be inoperable although still meeting the Surveillance Requirements.

4.0.4 This specification ensures that surveillance activities associated with a Limiting Conditions for Operation have been performed within the specified time interval prior to entry into an applicable OPERATIONAL CONDITION or other specified applicability condition. The intent of this provision is to ensure that surveillance activities have been satisfactorily demonstrated on a current basis as required to meet the OPERABILITY requirements of the Limiting Condition for Operation.

Under the terms of this specification, for example, during initial plant startup or following extended plant outage, the applicable surveillance activities must be performed within the stated surveillance interval prior to placing or returning the system or equipment into OPERABLE status.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
SUPPORTING AMENDMENT NO.82 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 October 27, 1989, the Washington Public Power Supply System proposed changes to the Technical Specifications for Nuclear Project No. 2. The proposed change removes the provision of specification 4.0.2 that limits the combined time interval for three consecutive surveillances to less than 3.25 times the specified interval. Guidance on this proposed change to technical specifications was provided to all power reactor licensees and applicants by Generic Letter 89-14, "Removal of the 3.25 Limit on Extending Surveillance Intervals," dated August 21, 1989.

2.0 EVALUATION

Specification 4.0.2 includes the provision that allows a surveillance interval to be extended by 25 per cent of the specified time interval. The extension provides flexibility for scheduling the performance of surveillances and to permit consideration of plant operating conditions that may not be suitable for conducting a surveillance at the specified time interval. Such operating conditions include transient plant operation or ongoing surveillance or maintenance activities. Specification 4.0.2 further limits the allowance for extending surveillance intervals by requiring that the combined time interval for any three consecutive surveillances not exceed 3.25 times the specified time interval. The purpose of this provision is to ensure that surveillances are not extended repeatedly as an operational convenience to provide an overall increase in the surveillance interval.

Experience has shown that the 18 month surveillance interval, with the provision to extend it by 25 per cent, is usually sufficient to accommodate normal variations in the length of a fuel cycle. However, the NRC staff has routinely granted requests for one time exceptions to the 3.25 limit on extending refueling surveillances because the risk to safety is low as compared with the alternative of a forced shutdown to perform these surveillances. Therefore, the 3.25 limitation on extending surveillances has not been a practical limit on the use of the 25 per cent allowance for extending surveillances that are not performed on a refueling outage basis.

Extending surveillance intervals during plant operation can also result in a benefit to safety when a scheduled surveillance is due at a time

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that is not suitable for conducting the surveillance. This may occur when transient plant operation conditions exist or when safety systems are out of service for maintenance or other surveillance activities. In such cases, the benefit to safety of extending a surveillance interval would exceed any safety benefit to be derived by limiting the use of the 25 per cent allowance to extend a surveillance. Further, there is an administrative burden associated with tracking the use of the 25 per cent allowance to ensure compliance with the 3.25 limit.

In view of these findings, the staff concluded that specification 4.0.2 should be changed to remove the 3.25 limit for all surveillances because its removal will have an overall positive effect on safety. The guidance provided in Generic Letter 89-14 included the following change to this specification and removes the the 3.25 limit on three consecutive surveillances with the following statement:

"4.02 Each surveillance requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 per cent of the specified surveillance interval."

In addition the bases of this specification were updated to reflect this change and noted that it is not the intent of the allowance for exceeding surveillance intervals that it be used repeatedly merely as an operational convenience to extend surveillance intervals beyond those specified.

The licensee has proposed changes to specification 4.0.2 that are consistent with the guidance provided in Generic Letter 89-14, as noted above. On the basis of its review of this matter, the staff finds that the proposed change to the technical specifications for WNP-2 is acceptable.

3.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in a requirement with respect to surveillance of facility components 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 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). 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.

4.0 CONTACT WITH STATE OFFICIAL

The Commission made a proposed determination that the amendment involves no significant hazards consideration (54 FR 53216, December 27, 1989) and consulted with the State of Washington. No public comments were received, and by letter dated March 20, 1990 the State of Washington advised that they have no comment.

5.0 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 Contributor: Thomas G. Dunning, OTSB/DOEA

Dated: April 26, 1990