

April 19, 1991

Docket No. 50-397

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

Dear Mr. Sorensen:

SUBJECT: CORRECTION TO AMENDMENT NO. 91 TO FACILITY OPERATING LICENSE NO.
NPF-21 (TAC NO. 79493)

On April 11, 1991, the Commission issued Amendment No. 91 to the operating license for the WPPSS Nuclear Project No. 2, in response to your application dated January 18, 1991. The amendment revised Technical Specification (TS) 3/4.7.4 to reflect recommendations of Generic Letter 90-09 for an alternative inspection schedule based on the number of unacceptable snubbers found during the previous inspection in proportion to the sizes of various snubber populations or categories.

Inadvertently, errors occurred on two of the TS pages issued with the amendment. Page 3/4 7-12 was an unchanged overleaf page which had been reproduced from a punched page. The position of a hole caused a broken marginal line which should have been a solid line as issued in amendment 54. Page 3/4 7-14a contained a typographical error in the first line of Note 4.

These errors have been corrected and the new pages, including overleaf, are enclosed. Please accept our apologies for any inconvenience these errors may have caused you.

Sincerely,

Original signed by
Patricia L. Eng, Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures:
TS pages 3/4 7-12
and 3/4 7-14a

cc w/enclosures:
See next page

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Washington Public Power Supply System

WPPSS Nuclear Project No. 2
(WNP-2)

cc:

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PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

c. Visual Inspection Acceptance Criteria

Visual inspections shall verify that: (1) the snubber has no visible indications of damage or impaired OPERABILITY, (2) attachments to the foundation or supporting structure are functional, and (3) fasteners for attachment of the snubber to the component and to the snubber anchorage are functional. Snubbers which appear inoperable as a result of visual inspections shall be classified as unacceptable and may be reclassified acceptable for the purpose of establishing the next visual inspection interval, provided that: (1) the cause of the rejection is clearly established and remedied for that particular snubber and for other snubbers irrespective of type that may be generically susceptible; and (2) the affected snubber is functionally tested in the as-found condition and determined OPERABLE per Specification 4.7.4f. All snubbers found connected to an inoperable common hydraulic fluid reservoir shall be counted as unacceptable for determining the next inspection interval. A review and evaluation shall be performed and documented to justify continued operation with an unacceptable snubber. If continued operation cannot be justified, the snubber shall be declared inoperable and the ACTION requirements shall be met.

d. Transient Event Inspection

An inspection shall be performed of all hydraulic and mechanical snubbers attached to sections of systems that have experienced unexpected, potentially damaging transients as determined from a review of operational data and a visual inspection of the systems within 6 months following such an event. In addition to satisfying the visual inspection acceptance criteria, freedom-of-motion of mechanical snubbers shall be verified using at least one of the following: (1) manually induced snubber movement; or (2) evaluation of in-place snubber piston setting; or (3) stroking the mechanical snubber through its full range of travel.

PLANT SYSTEMS

SURVEILLANCE REQUIREMENTS (Continued)

e. Functional Tests

During the first refueling shutdown and at least once per 18 months thereafter during shutdown, a representative sample of snubbers shall be tested using one of the following sample plans. The sample plan shall be selected prior to the test period and cannot be changed during the test period. The NRC Regional Administrator shall be notified in writing of the sample plan selected prior to the test period or the sample plan used in the prior test period shall be implemented:

- 1) At least 10% of the total of each type of snubber shall be functionally tested either in-place or in a bench test. For each snubber of a type that does not meet the functional test acceptance criteria of Specification 4.7.4f., an additional 5% of that type of snubber shall be functionally tested until no more failures are found or until all snubbers of that type have been functionally tested; or
- 2) A representative sample of 37 snubbers shall be functionally tested in accordance with Figure 4.7-1. "C" is the total number of snubbers found not meeting the acceptance requirements of Specification 4.7.4f. The cumulative number of snubbers of a type tested is denoted by "N". If at any time the point plotted falls in the "Accept" region, testing of snubbers may be terminated. When the point plotted lies in the "Continue Testing" region, additional snubbers shall be tested until the point falls in the "Accept" region or all the snubbers have been tested. Testing equipment failure during functional testing may invalidate that day's testing and allow that day's testing to resume anew at a later time provided all snubbers tested with the failed equipment during the day of equipment failure are retested.

The representative sample selected for the functional test sample plans shall be randomly selected from the snubbers of each type and reviewed before beginning the testing. The review shall ensure, as far as practicable, that they are representative of the various configurations, operating environments, range of size, and capacity of snubbers of each type. Snubbers placed in the same location as snubbers which failed the previous functional test shall be retested at the time of the next functional test but shall not be included in

**TABLE 4.7-1
SNUBBER VISUAL INSPECTION INTERVAL**

Population or Category (Notes 1 and 2)	NUMBER OF UNACCEPTABLE SNUBBERS		
	Column A Extended Interval (Notes 3 and 6)	Column B Repeat Interval (Notes 4 and 6)	Column C Reduce Interval (Notes 5 and 6)
1	0	0	1
80	0	0	2
100	0	1	4
150	0	3	8
200	2	5	13
300	5	12	25
400	8	18	36
500	12	24	48
750	20	40	78
1000 or greater	29	56	109

Note 1: The next visual inspection interval for a snubber population or category size shall be determined based upon the previous inspection interval and the number of unacceptable snubbers found during that interval. Snubbers may be categorized, based upon their accessibility during power operation, as accessible or inaccessible. These categories may be examined separately or jointly. However, the licensee must make and document that decision before any inspection and shall use that decision as the basis upon which to determine the next inspection interval for that category.

Note 2: Interpolation between population or category sizes and the number of unacceptable snubbers is permissible. Use next lower integer for the value of the limit for Columns A, B or C if that integer includes a fractional value of unacceptable snubbers as determined by interpolation.

Note 3: If the number of unacceptable snubbers is equal to or less than the number in Column A, the next inspection interval may be twice the previous interval but not greater than 48 months.

Note 4: If the number of unacceptable snubbers is equal to or less than the number in Column B but greater than the number in Column A, the next inspection interval shall be the same as the previous interval.

Note 5: If the number of unacceptable snubbers is equal to or greater than the number in Column C, the next inspection interval shall be two-thirds of the previous interval. However, if the number of unacceptable snubbers is less than the number in column C but greater than the number in Column B, the next interval shall be reduced proportionally by interpolation, that is, the previous interval shall be reduced by a factor that is one-third of the ratio of the difference between the number of unacceptable snubbers found during the previous interval and the number in column B to the difference in numbers in Columns B and C.

Note 6: The provisions of Specification 4.0.2 are applicable for all inspection intervals up to and including 48 months.