Docket No. 50-397

March 2, 1992

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

Dear Mr. Sorensen:

SUBJECT: ISSUANCE OF AMENDMENT FOR THE WASHINGTON PUBLIC POWER SUPPLY SYSTEM NUCLEAR PROJECT NO. 2 (TAC NO. M80128)

The Commission has issued the enclosed Amendment No. 99 to Facility Operating License No. NPF-21 for WPPSS Nuclear Project No. 2. The amendment consist of changes to the Technical Specifications in response to your application dated March 11, 1991 (G02-91-049).

The amendment increases the surveillance intervals for the channel functional tests of isolation actuation instrumentation from monthly to quarterly. The amendment also increases the allowable outage times for single trip system channels from 2 hours to 6 hours and clarifies when the required actions should be taken with one or more isolation actuation instrumentation channels inoperable.

A copy of the related Safety Evaluation is also enclosed. A notice of issuance will be included in the Commission's next regular biweekly <u>Federal</u> Register notice.

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

Enclosures:

Amendment No. 99 to NPF-21
 Safety Evaluation

OFFICIAL DOCUMENT NAME: W80128.AMD

cc w/enclosures: See next page

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

March 2, 1992

Docket No. 50-397

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Sincepe

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

Enclosures:

- 1. Amendment No. 99 to NPF-21
- 2. Safety Evaluation

cc w/enclosures: See next page Mr. G. C. Sorensen Washington Public Power Supply System

cc: Mr. J. W. Baker WNP-2 Plant Manager Washington Public Power Supply System P.O. Box 968, MD 927M Richland, Washington 99352

G. E. C. Doupe, Esq. Washington Public Power Supply System 3000 George Washington Way P. O. Box 968, MD 396 Richland, Washington 99532

Mr. R. G. Waldo, Chairman Energy Facility Site Evaluation Council Mail Stop PY-11 Olympia, Washington 98504

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

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

Mr. L. L. Grumme, Acting Director Licensing and Assurance Washington Public Power Supply System P. O. Box 968, MD 280 Richland, Washington 99352 WPPSS Nuclear Project No. 2 (WNP-2)

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

Chairman Benton County Board of Commissioners P. O. Box 190 Prosser, Washington 99350-0190

Mr. R. C. Sorensen U. S. Nuclear Regulatory Commission P. O. Box 69 Richland, Washington 99352

Nicholas S. Reynolds, Esq. Winston & Strawn 1400 L Street, N.W. Washington, D.C. 20005-3502



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

### WASHINGTON PUBLIC POWER SUPPLY SYSTEM

### DOCKET NO. 50-597

### NUCLEAR PROJECT NO. 2

### AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 99 License No. NPF-21

- 1. The Nuclear Regulatory Commission (the Commission) has found that:
  - A. The application for amendment by the Washington Public Power Supply System (licensee), dated March 11, 1991, 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 rules and 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;
  - 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 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:

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### (2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 99, 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

Theodore R. Quay

Theodore R. Quay, Director Project Directorate V Division of Reactor Projects III/IV/V Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical Specifications

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Date of Issuance: March 2, 1992

- 2 -

## ATTACHMENT TO LICENSE AMENDMENT

# AMENDMENT NO. 99 TO 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. The corresponding overleaf pages are also provided to maintain document completeness.

### <u>Remove</u>

### <u>Insert</u>

3/4 3-10	3/4 3-10
3/4 3-15	3/4 3-15
3/4 3-22	3/4 3-22
3/4 3-23	3/4 3-23
3/4 3-24	3/4 3-24

### TABLE 4.3.1.1-1 (Continued)

### REACTOR PROTECTION SYSTEM INSTRUMENTATION SURVEILLANCE REQUIREMENTS

### TABLE NOTATIONS

(a) Neutron detectors may be excluded from CHANNEL CALIBRATION.

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- (b) The IRM and SRM channels shall be determined to overlap for at least 1/2 decade during each startup after entering OPERATIONAL CONDITION 2 and the IRM and APRM channels shall be determined to overlap for at least 1/2 decade during each controlled shutdown, if not performed within the previous 7 days.
- (c) Within 24 hours prior to startup, if not performed within the previous 7 days.
- (d) This calibration shall consist of the adjustment of the APRM channel to conform to the power values calculated by a heat balance during OPERATIONAL CONDITION 1 when THERMAL POWER > 25% of RATED THERMAL POWER. Adjust the APRM channel if the absolute difference is greater than 2% of RATED THERMAL POWER. Any APRM channel gain adjustment made in compliance with Specification 3.2.2 shall not be included in determining the absolute difference.
- (e) This calibration shall consist of the adjustment of the APRM flow biased channel to conform to a calibrated flow signal.
- (f) The LPRMs shall be calibrated at least once per 1000 effective full power hours (EFPH) using the TIP system.
- (g) Measure and compare core flow to rated core flow.
- (h) This calibration shall consist of verifying the  $6 \pm 1$  second simulated thermal power time constant.
- (i) This function is not required to be OPERABLE when the reactor pressure vessel head is removed per Specification 3.10.1.
- (j) With any control rod withdrawn. Not applicable to control rods removed per Specification 3.9.10.1 or 3.9.10.2.

### INSTRUMENTATION

## 3/4.3.2 ISOLATION ACTUATION INSTRUMENTATION

### LIMITING CONDITION FOR OPERATION

3.3.2 The isolation actuation instrumentation channels shown in Table 3.3.2-1 shall be OPERABLE with their trip setpoints set consistent with the values shown in the Trip Setpoint column of Table 3.3.2-2 and with ISOLATION SYSTEM RESPONSE TIME as shown in Table 3.3.2-3.

APPLICABILITY: As shown in Table 3.3.2-1.

### ACTION:

- a. With an isolation actuation instrumentation channel trip setpoint less conservative than the value shown in the Allowable Values column of Table 3.3.2-2, declare the channel inoperable until the channel is restored to OPERABLE status with its trip setpoint adjusted consistent with the Trip Setpoint value.
- b. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for one trip system:
  - 1. If placing the inoperable channel(s) in the tripped condition would cause an isolation, the inoperable channel(s) shall be restored to OPERABLE status within
    - a) 12 hours for trip functions common to RPS Instrumentation; and
    - b) 24 hours for trip functions not common to RPS Instrumentation.

or the ACTION required by Table 3.3.2-1 for the affected trip function shall be taken.

### OR

- 2. If placing the inoperable channel(s) in the tripped conditions would not cause an isolation, the inoperable channel(s) and/or that trip system shall be placed in the tripped condition within
  - a) 12 hours for trip functions common to RPS Instrumentation; and
  - b) 24 hours for trip functions not common to RPS Instrumentation.

The provisions of Specification 3.0.4 are not applicable.

c. With the number of OPERABLE channels less than required by the Minimum OPERABLE Channels per Trip System requirement for both trip systems, place at least one trip system\* in the tripped condition within one hour and take the ACTION required by Table 3.3.2-1.

<sup>\*</sup>Place one trip system (with the most inoperable channels) in the tripped condition. The trip system need not be placed in the tripped condition when this would cause the isolation to occur.

### TABLE 3.3.2-1 (Continued)

### ISOLATION ACTUATION INSTRUMENTATION

### ACTION STATEMENTS

ACTION	20	-	Be in at least HOT SHUTDOWN within 12 hours and in COLD SHUTDOWN
			within the next 24 hours.
ACTION	21	-	Be in at least STARTUP with the associated isolation valves
			closed within 6 hours or be in at least HOT SHUTDOWN within
			12 hours and in COLD SHUTDOWN within the next 24 hours.
ACTION	22	_	
ACTION	22	-	Close the affected system isolation valves within 1 hour and
			declare the affected system inoperable.
ACTION	23	•	Be in at least STARTUP within 6 hours.
ACTION	24		Restore the manual initiation function to OPERABLE status
			within 8 hours or close the affected system isolation valves
			within the next hour and declare the affected system inoperable
			or be in at least HOT SHUTDOWN within the next 12 hours and in
	<b>0F</b>		COLD SHUTDOWN within the following 24 hours.
ACTION	25	-	Establish SECONDARY CONTAINMENT INTEGRITY with the standby gas
			treatment system operating within 1 hour.
ACTION	26	-	Lock close or close, as applicable, the affected system isolation
			valves within 1 hour and declare the affected system inoperable.

### TABLE NOTATIONS

\*May be bypassed with reactor steam pressure  $\leq$  1037 psig and all turbine stop valves closed.

- \*\*When handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel. #During CORE ALTERATIONS and operations with a potential for draining the reactor vessel.
- (a)A channel may be placed in an inoperable status for up to 6 hours for required surveillance without placing the trip system in the tripped condition provided at least one other OPERABLE channel in the same trip system is monitoring that parameter.
- (b)Also actuates the standby gas treatment system.
- (c)Also trips and isolates the mechanical vacuum pumps.
- (d)A channel is OPERABLE if 2 of 4 detectors in that channel are OPERABLE.
- (e)Also actuates secondary containment ventilation isolation dampers per Table 3.6.5.2-1.
- (f)Closes only RWCU system outboard isolation valve RWCU-V-4.
- (g)Only valves RHR-V-123A and RHR-V-123B in Valve Group 5 are required for primary isolation.
- (h)Manual initiation isolates RCIC-V-8 only and only with a coincident reactor vessel level-low, level 3.
- (i)Not required for RHR-V-8 when control is transferred to the alternate remote shutdown panel during operational conditions 1, 2 & 3 and the isolation interlocks are bypassed. When RHR-V-8 control is transferred to the remote shutdown panel under operational modes 1, 2, and 3 the associated key lock switch will be locked with the valve in the closed position. Except RHR-V-8 can be returned to, and operated from, the control room, with the interlocks and automatic isolation capability reestablished in operational conditions 2 and 3 when reactor pressure is less than 135 psig.

TABLE 3.3.2-2

# ISOLATION ACTUATION INSTRUMENTATION SETPOINTS

	RIP FU	NCTION	TRIP SETPOINT	ALLOWABLE VALUE
1.	<u>PR</u>	IMARY CONTAINMENT ISOLATION		
	a. b. c. d. e. f. g.	<ul> <li>Reactor Vessel Water Level</li> <li>1) Low, Level 3</li> <li>2) Low Low, Level 2</li> <li>Drywell Pressure - High</li> <li>Main Steam Line</li> <li>1) Radiation - High</li> <li>2) Pressure - Low</li> <li>3) Flow - High</li> <li>Main Steam Line Tunnel</li> <li>Temperature - High</li> <li>Main Steam Line Tunnel</li> <li>A Temperature - High</li> <li>Condenser Vacuum - Low</li> </ul>	<pre>&gt; 13.0 inches* &gt; -50 inches* &lt; 1.68 psig &lt; 3.0 x full power background &gt; 831 psig &lt; 105.5 psid &lt; 164°F &lt; 80°F &gt; 23 inches Hg absolute pressure N.A.</pre>	<pre>&gt; 11.0 inches &gt; -57 inches &lt; 1.88 psig &lt; 3.6 x full power background &gt; 811 psig &lt; 108 psid &lt; 170°F &lt; 90°F &gt; 24.5 inches Hg absolute pressure</pre>
2.	_	CONDARY CONTAINMENT ISOLATION	N. A.	N.A.
	<u>a.</u>			
	а. b. c. d.	Reactor Building Vent Exhaust Plenum Radiation - High Drywell Pressure - High Reactor Vessel Water Level - Low Low, Level 2 Manual Initiation	<pre>&lt; 13.0 mR/h </pre> ≤ 1.68 psig  > -50 inches*  N.A.	<pre>&lt; 16.0 mR/h </pre> <pre>&lt; 1.88 psig </pre>
			*** * ***	Ñ.A.

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### TABLE 3.3.2-3 (Continued)

### ISOLATION SYSTEM INSTRUMENTATION RESPONSE TIME

### TABLE NOTATIONS

- (a)The isolation system instrumentation response time shall be measured and recorded as a part of the ISOLATION SYSTEM RESPONSE TIME. Isolation system instrumentation response time specified includes the diesel generator starting and sequence loading delays assumed in the accident analysis.
- (b)Radiation detectors are exempt from response time testing. Response time shall be measured from detector output or the input of the first electronic component in the channel.
  - \*Isolation system instrumentation response time for MSIVs only. No diesel generator delays assumed.
- \*\*Isolation system instrumentation response time for associated valves except MSIVs.
- #Isolation system instrumentation response time specified for the Trip Function actuating each valve group shall be added to isolation time shown in Table 3.6.3-1 and 3.6.5.2-1 for valves in each valve group to obtain ISOLATION SYSTEM RESPONSE TIME for each valve.

##This response time does not include the 45-second time delay.

# TABLE 4.3.2.1-1

# ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

TR	IP FL	UNCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED
1.	PRIMARY CONTAINMENT ISOLATION					
	a. b. c. d. e. f.	Reactor Vessel Water Level- 1) Low, Level 3 2) Low Low, Level 2 Drywell Pressure - High Main Steam Line 1) Radiation - High 2) Pressure - Low 3) Flow - High Main Steam Line Tunnel Temperature - High Main Steam Line Tunnel Δ Temperature - High	S N. A. N. A. S N. A. S N. A. N. A.	Q Q Q Q Q SA SA	R R R R R R R	$ \begin{array}{cccccccccccccccccccccccccccccccccccc$
	и. g.	Condenser Vacuum - Low Manual Initiation	N.A. N.A.	Q R	R	1, 2, 3 1, 2*, 3* 1, 2, 3
2.	SECO	ONDARY CONTAINMENT ISOLATION		n	N.A.	1, 2, 3
	a. b. c.	Reactor Building Vent Exhaust Plenum Radiation - High Drywell Pressure - High Reactor Vessel Water	S N. A.	Q Q	R R	1, 2, 3, and ** 1, 2, 3
	d.	Level - Low Low, Level 2 Manual Initiation	N.A. N.A.	Q R	R N.A.	1, 2, 3, and # 1, 2, 3, and **

WASHINGTON NUCLEAR - UNIT 2

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## TABLE 4.3.2.1-1 (Continued)

## ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS

	RIP FU	INCTION	CHANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE_REQUIRED
3	. <u>REA</u>	CTOR WATER CLEANUP SYSTEM ISOLA	TION			
	a. b.	Δ Flow - High Heat Exchangen Anna	S	Q	R	1, 2, 3
		Heat Exchanger Area Temperature - High	N.A.	SA	R	1, 2, 3
	c.	Heat Exchanger Area Ventilation ∆ Temperature -			_	
	d.	High Pump Area Temperature - High	N.A	SA	R	1, 2, 3
	u.	Pump Room A	N.A	SA	R	1 2 2
		Pump Room B	N.A.	SA	R	1, 2, 3 1, 2, 3
ر ۲	e.	Pump Area Ventilation Δ Temp High		54	N	1, 2, 3
>		Pump Room A	N.A.	SA	R	1. 2. 3
		Pump Room B	N.A.	SA	R	1, 2, 3 1, 2, 3 1, 2, 3
3 3	f.	SLCS Initiation	N.A.	R	N. A.	1, 2, 3
	g.	Reactor Vessel Water				, ,
	h.	Level - Low Low, Level 2 RWCU/RCIC Line Routing Area	N.A.	Q	R	1, 2, 3
		Temperature - High	N.A.	SA	R	1, 2, 3
	i	RWCU Line Routing Area				
		Temperature - Ĥigh	N.A.	SA	R	1, 2, 3
	j.	Manual Initiation	N.A.	R	N.A.	1, 2, 3
4	. <u>REA</u>	CTOR CORE ISOLATION COOLING SYS	TEM ISOLATION			
	a.	RCIC Steam Line Flow - High	S	Q	R	1, 2, 3
	b.	RCIC/RHR Steam Line Flow - Hi	gh S	Q	R	1, 2, 3 1, 2, 3
	с.	RCIC Steam Supply Pressure -	-			
		Low	N.A.	Q	R	1, 2, 3
	d.	RCIC Turbine Exhaust Diaphrag		-	-	
	-	Pressure - High	N.A.	Q	R	1, 2, 3
ŧ	e.	RCIC Equipment Room Temperature - High	N.A.	SA	R	1, 2, 3
2	f.	RCIC Equipment Room	N: A	C A	<b>b</b>	1 0 0
2		∆ Temperature - High	N.A.	SA	R	1, 2, 3

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Amendment No. 79, 99

WA	TABLE 4.3.2.1-1 (Continued)							
SHIN	ISOLATION ACTUATION INSTRUMENTATION SURVEILLANCE REQUIREMENTS							
WASHINGTON NUCLEAR				HANNEL CHECK	CHANNEL FUNCTIONAL TEST	CHANNEL CALIBRATION	OPERATIONAL CONDITIONS FOR WHICH SURVEILLANCE REQUIRED	
LEAI	4.	REA	CTOR CORE ISOLATION COOLING SYST	M ISOLATION (C	ontinued)			
R - UNIT		g.	RWCU/RCIC Steam Line Routing Area Temperature - High	N.A.	SA	R	1, 2, 3	
		h. i.	Drywell Pressure - High	N.A.	Q	R	1, 2, 3	
			Manual Initiation <u>SYSTEM SHUTDOWN COOLING MODE ISC</u>	N.A.	R	N.A.	1, 2, 3	
	5.							
3/4		a.	Reactor Vessel Water Level - Low, Level 3	S	Q	R	1, 2, 3	
/4 3-24		b.	Reactor Vessel (RHR Cut-in Permissive) Pressure - High	N.A.	Q	R	1, 2, 3	
		c.	Equipment Area Temperature - High	N.A.	SA	R	1, 2, 3	
		ď.	Equipment Area Ventilation Δ Temp High	N.A.	SA	R	1, 2, 3	
		e.	Shutdown Cooling Return Flow Rate - High	N.A.	Q	R	1, 2, 3	
		f.	RHR Heat Exchanger Area Temperature - High	N.A.	SA	R	1, 2, 3	
Amendm		g.	Manual Initiation	N.A.	R	N. A.	1, 2, 3	
Ę			,	TARIE NO	TATIONS			

### TABLE 4.3.2.1-1 (Continued)

TABLE NOTATIONS

When reactor steam pressure  $\geq$  1037 psig and/or any turbine stop value is open. \*

When handling irradiated fuel in the secondary containment and during CORE ALTERATIONS and operations with a potential for draining the reactor vessel. \*\*

During CORE ALTERATION and operations with a potential for draining the reactor vessel. #

Amendment No. k

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

## SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

# RELATED TO AMENDMENT NO. 99 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 March 11, 1991 (G02-91-049), Washington Public Power Supply System submitted a request for changes to the Technical Specifications (TS) for Nuclear Project No. 2. The proposed changes would increase the surveillance intervals for the channel functional tests of isolation actuation instrumentation from monthly to quarterly. The proposed amendment also increases the allowable outage times for single trip system channels from 2 hours to 6 hours and clarifies when the required actions should be taken with one or more isolation actuation instrumentation channels inoperable. For those isolation actuation instruments which are common to both the Reactor Protection System and the isolation actuation instrumentation, the more restrictive requirements are proposed.

### 2.0 EVALUATION

The proposed TS changes affect the isolation actuation instrumentation surveillance test intervals (STIs), allowable outage times (AOTs) for test and repair of associated instruments, and the limiting conditions for operation (LCO) resulting from inoperable isolation actuation instrument channels.

The licensee proposes to increase the isolation actuation instrumentation STIs from monthly to quarterly, the AOTs for testing from 2 hours to 6 hours, and the AOTs for instrument repairs from 1 hour to 24 hours. Also, changes are proposed to TS 3/4.3.2, "Isolation Actuation Instrumentation - Limiting Condition for Operation." The bases for these changes have been identified by the licensee as contained in the following General Electric (GE) Topical Reports (TRs):

- Technical Specification Improvement Analysis for BWR Isolation Actuation Instrumentation (Reference 2)

92030 3270299

- Technical Specification Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation (Reference 3)

The staff's evaluation of GE's TRs are documented in two safety evaluation reports (References 4 and 5) which found that increased times for STIs and AOTs were acceptable provided that the licensee:

- confirmed that the GE generic analyses presented in the two Topical Reports were applicable to the WNP-2 facility, and
- confirmed that any increase in instrument drift due to the extended surveillance test interval is properly accounted for in the setpoint calculation methodology.

The licensee's March 11, 1991, submittal included a GE letter to WPPSS (Reference 6) that included Enclosure 1, "Isolation Actuation Instrumentation Surveillance Requirements." The enclosure tables included a comparison of isolation actuation instrumentation surveillance requirements associated with three BWR-6 type plants and three BWR-5 type plants for comparison to the WNP-2 facility. WNP-2 is a BWR-5 facility. The WNP-2 isolation actuation instrumentation instrumentation surveiles summarized in Table 5.5 of Reference 2.

GE has attested by affidavit that the case studies of Table 5.5 were bounded by the envelope which they defined, and that the generic analysis of the GE TRs are applicable to the WNP-2 facility. Therefore, the Topical Report analyses provide an adequate basis for TS changes to extend the STIs and AOTs for test and repair of WNP-2 isolation actuation instrumentation.

In a letter (Reference 7), the NRC provided additional guidance regarding instrument drift when extending the STIs as follows:

- either the instrument drift expected under the extended STIs remains within the existing allowance in the instrument setpoint calculation, or
- the allowance and setpoint are adjusted to account for the additional drift, and
- records showing the actual setpoint calculation and supporting data should be retained onsite for possible future staff audit.

The licensee has reviewed the setpoint drift characteristics of the isolation actuation instrumentation affected by this TS change and confirmed that the setpoints will remain within the existing allowances throughout the requested STI time increase.

The licensee also proposes to revise TS 3/4.3.2, "Isolation Actuation Instrumentation - Limiting Conditions for Operation," with regard to the action statement when a channel is found inoperable. The changes proposed by the

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licensee agree with those discussed in Enclosure 2 of a letter (Reference 5) from NRC to the Boiling Water Reactor Owners Group (BWROG). The enclosure provided an acceptable format for proposed TS changes based on GE's TR NEDC-31677P-A, including those discussed in the NRC staff letter to the BWROG chairman, Reference 4.

The licensee has concluded that increasing the STIs provides a potential reduction of plant scrams, reduces excessive test cycles on equipment, and decreases diversion of plant personnel and resources to perform tests. The results of increasing AOTs for test and repair is an enhancement of tests and repairs by reducing operator errors. Therefore, increasing both the STIs and AOTs for testing and repair should increase plant safety and improve operations.

The staff finds the WPPSS request of March 11, 1991, to amend the license for WNP-2 to be acceptable. This conclusion is based on the staff's previous acceptance of the GE TRs as documented in References 4 and 5, the assertion in an affidavit from GE that the GE TRs (References 2 and 3) are applicable to WNP-2, and the fact that the concerns regarding setpoint drift have been addressed by the licensee in Reference 7.

### 3.0 STATE CONSULTATION

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In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment. The State official had no comments.

#### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or changes surveillance requirements. The NRC staff has determined that the 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 the amendment involves no significant hazards consideration, and there has been no public comment on such finding (56 FR 37593). Accordingly, the 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 the amendment.

### 5.0 <u>CONCLUSION</u>

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

Principal Contributor: Frederick P. Paulitz, SICB

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Date: March 2, 1992

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### 6.0 <u>REFERENCES</u>

- 1. Letter to NRC from G.C. Sorensen, WPPSS, G02-91-049, dated March 11, 1991.
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- 3. Frederick, L.G., et al., "Technical Specification Improvement Analysis for BWR Isolation Instrumentation Common to RPS and ECCS Instrumentation," Topical Report NEDC-30851P-A, Supplement 2, General Electric Company, dated March, 1989.
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