

January 5, 1995

Mr. J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations  
Washington Public Power Supply System  
P.O. Box 968  
Richland, Washington 99352-0968

SUBJECT: ISSUANCE OF AMENDMENT FOR THE WASHINGTON PUBLIC POWER SUPPLY SYSTEM  
NUCLEAR PROJECT NO. 2 (TAC NO. M90201)

Dear Mr. Parrish:

The Commission has issued the enclosed Amendment No. 133 to the Facility Operating License No. NPF-21 for WPPSS Nuclear Project No. 2. The amendment consists of changes to the Technical Specifications (TS) in response to your application dated August 8, 1994.

The amendment modifies the TS to delete the reference to written relief from ASME Code requirements being granted by the NRC. The revised TS refer to the provision in NRC regulations concerning the ASME Code. The amendment also adds a definition for the word "biennial."

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

Sincerely,

ORIGINAL SIGNED BY:  
James W. Clifford, Senior Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. Amendment No. 133 to NPF-21  
2. Safety Evaluation

cc w/encls: See next page

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DOCUMENT NAME: WNP90201.AMD

\* See previous concurrence

OFC	LA/DRPW <i>DF</i>	BC/EMCB	BC/EMEB	OGC	PM/PDIV-2
NAME	DFoster-Curseen	JStrosnider*	RWessman*	EHoller*	JClifford:pk
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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

January 5, 1995

Mr. J. V. Parrish (Mail Drop 1023)  
Assistant Managing Director, Operations  
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A copy of the related Safety Evaluation is also enclosed. A notice of issuance will be included in the Commission's next regular biweekly Federal Register notice.

Sincerely,

A handwritten signature in cursive script that reads "James W. Clifford".

James W. Clifford, Senior Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. Amendment No. 133 to NPF-21  
2. Safety Evaluation

cc w/encls: See next page

Mr. J. V. Parrish  
Washington Public Power Supply System

WPPSS Nuclear Project No. 2  
(WNP-2)

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

DOCKET NO. 50-397

NUCLEAR PROJECT NO. 2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 133  
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 August 8, 1994, 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:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. 133 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 immediately and will be implemented within 30 days of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



James W. Clifford, Senior Project Manager  
Project Directorate IV-2  
Division of Reactor Projects III/IV  
Office of Nuclear Reactor Regulation

Attachment:  
Changes to the Technical  
Specifications

Date of Issuance: January 5, 1995

ATTACHMENT TO LICENSE AMENDMENT

AMENDMENT NO. 133 TO FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Appendix A Technical Specifications and the bases section 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.

REMOVE

3/4 0-2  
B 3/4 0-6  
B 3/4 4-5

INSERT

3/4 0-2  
B 3/4 0-6  
B 3/4 4-5

### 3/4.0 APPLICABILITY

#### LIMITING CONDITION FOR OPERATION

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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 allowed surveillance interval defined by Specification 4.0.2 shall constitute noncompliance with the OPERABILITY requirements for a Limiting Condition for Operation. The time limits of the ACTION requirements are applicable at the time it is identified that a Surveillance Requirement has not been performed. The ACTION requirements may be delayed for up to 24 hours to permit the completion of the surveillance when the allowable outage time limits of the ACTION requirements are less than 24 hours. 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. This provision shall not prevent passage through or to OPERATIONAL CONDITIONS as required to comply with ACTION requirements.

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.
- 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:

<u>ASME Boiler and Pressure Vessel Code and applicable Addenda terminology for inservice inspection and testing activities</u>	<u>Required frequencies for performing inservice inspection and testing activities</u>
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
Biennially or every two years	At least once per 731 days



## APPLICABILITY

### BASES (Continued)

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Limiting Condition for Operation that is subject to enforcement action. Further, the failure to perform a surveillance within the provisions of Specification 4.0.2 is a violation of a Technical Specification requirement and is, therefore, a reportable event under the requirements of 10 CFR 50.73(a)(2)(i)(B) because it is a condition prohibited by the plant's Technical Specifications.

If the allowable outage time limits of the ACTION requirements are less than 24 hours or a shutdown is required to comply with ACTION requirements, e.g., Specification 3.0.3., a 24-hour allowance is provided to permit a delay in implementing the ACTION requirements. This provides an adequate time limit to complete Surveillance Requirements that have not been performed. The purpose of this allowance is to permit the completion of a surveillance before a shutdown would be required to comply with ACTION requirements or before other remedial measures would be required that may preclude the completion of a surveillance. The basis for this allowance includes consideration for plant conditions, adequate planning, availability of personnel, the time required to perform the surveillance, and the safety significance of the delay in completing the required surveillance. This provision also provides a time limit for the completion of Surveillance Requirements that become applicable as a consequence of CONDITION changes imposed by ACTION requirements and for completing Surveillance Requirements that are applicable when an exception to the requirements of Specification 4.0.4 is allowed. If a surveillance is not completed within the 24-hour allowance, the time limits of the ACTION requirements are applicable at that time. When a surveillance is performed within the 24-hour allowance and the Surveillance Requirements are not met, the time limits of the ACTION requirements are applicable at the time that the surveillance is terminated.

Surveillance Requirements do not have to be performed on inoperable equipment because the ACTION requirements define the remedial measures that apply. However, the Surveillance Requirements have to be met to demonstrate that inoperable equipment has been restored to OPERABLE status.

Specification 4.0.4 establishes the requirement that all applicable surveillances must be met before entry into an OPERATIONAL CONDITION or other condition of operation specified in the Applicability statement. The purpose of this specification is to ensure that system and component OPERABILITY requirements or parameter limits are met before entry into an OPERATIONAL CONDITION or other specified condition for which these systems and components ensure safe operation of the facility. This provision applies to changes in OPERATIONAL CONDITIONS or other specified conditions associated with plant shutdown as well as startup.

Under the provisions of this specification, the applicable Surveillance Requirements must be performed within the specified surveillance interval to assume that the Limiting Conditions for Operation are met during initial plant startup or following a plant outage.

## APPLICABILITY

### BASES (Continued)

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When a shutdown is required to comply with ACTION requirements, the provisions of Specification 4.0.4 do not apply because this would delay placing the facility in a lower CONDITION of operation.

Specification 4.0.5 establishes the requirement that 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 a periodically updated version of Section XI of the ASME Boiler and Pressure Vessel Code and Addenda as required by 10 CFR 50.55a. This Specification also contains the requirements for the additional inspection program established in Generic Letter 88-01, "NRC Position on Intergranular Stress Corrosion Cracking (IGSCC) in BWR Austenitic Stainless Steel Piping." An alternative schedule to these requirements was provided by the NRC. This alternative schedule allows for Category D & E welds to be inspected every three years, as opposed to every two cycles as specified in the Generic Letter. (Letter, JW Clifford (NRC) to GC Sorensen (Supply System), dated January 19, 1993, "Alternate Schedule for IGSCC Inspections (TAC No. M84714)").

This specification includes a clarification of the frequencies for performing the inservice inspection and testing activities required by Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda. This clarification is provided to ensure consistency in surveillance intervals throughout the Technical Specifications and to remove any ambiguities relative to the frequencies for performing the required inservice inspection and testing activities.

Under the terms of this specification, the more restrictive requirements of the Technical Specifications take precedence over the ASME Boiler and Pressure Vessel Code and applicable Addenda. The requirements of Specification 4.0.4 to perform surveillance activities before entry into an OPERATIONAL CONDITION or other specified condition takes precedence over the ASME Boiler and Pressure Vessel Code provision that allows pumps and valves to be tested up to one week after return to normal operation. The Technical Specification definition of OPERABLE does not allow a grace period before a component, which is not capable of performing its specified function, is declared inoperable and takes precedence over the ASME Boiler and Pressure Vessel Code provision that allows a valve to be incapable of performing its specified function for up to 24 hours before being declared inoperable.

## REACTOR COOLANT SYSTEM

### BASES

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#### PRESSURE/TEMPERATURE LIMITS (Continued)

The pressure-temperature limit lines shown in Figures 3.4.6.1 and 3.4.6.1.c for reactor criticality and for inservice leak and hydrostatic testing have been provided to assure compliance with the minimum temperature requirements of Appendix G to 10 CFR Part 50 for reactor criticality and for inservice leak and hydrostatic testing.

#### 3/4.4.7 MAIN STEAM LINE ISOLATION VALVES

Double isolation valves are provided on each of the main steam lines to minimize the potential leakage paths from the containment in case of a line break. Only one valve in each line is required to maintain the integrity of the containment, however, single failure considerations require that two valves be OPERABLE. The surveillance requirements are based on the operating history of this type valve. The maximum closure time has been selected to contain fission products and to ensure the core is not uncovered following line breaks. The minimum closure time is consistent with the assumptions in the safety analyses to prevent pressure surges.

#### 3/4.4.8 STRUCTURAL INTEGRITY

The inspection programs for ASME Code Class 1, 2 and 3 components ensure that the structural integrity of these components will be maintained at an acceptable level throughout the life of the plant.

Access to permit inservice inspections of components of the reactor coolant system is in accordance with Section XI of the ASME Boiler and Pressure Vessel Code 1974 Edition and Addenda through Summer 1975.

The inservice inspection program for ASME Code Class 1, 2 and 3 components will be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable addenda as required by 10 CFR 50.55a.

#### 3/4.4.9 RESIDUAL HEAT REMOVAL

A single shutdown cooling mode loop provides sufficient heat removal capability for removing core decay heat and mixing to assure accurate temperature indication, however, single failure considerations require that two loops be OPERABLE or that alternate methods capable of decay heat removal be demonstrated and that an alternate method of coolant mixing be in operation.

Revised NRC Letter dated:  
July 14, 1994

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UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 133 TO FACILITY OPERATING LICENSE NO. NPF-21  
WASHINGTON PUBLIC POWER SUPPLY SYSTEM  
NUCLEAR PROJECT NO. 2  
DOCKET NO. 50-397

1.0 INTRODUCTION

In its letter dated August 8, 1994, the Washington Public Power Supply System (WPPSS or the licensee) proposed that Appendix A of Facility Operating License NPF-21 be amended to revise the WPPSS Unit No. 2 Technical Specifications (TS). Specifically, the proposed amendment would change TS 4.0.5.a, "Applicability - Surveillance Requirements," which specifies the surveillance requirements for implementation of the regulations for inservice inspection (ISI) and inservice testing (IST) in accordance with 10 CFR 50.55a. The proposed change is consistent with the revised standard technical specifications for boiling-water reactor (BWR) plants (NUREG-1433/1434).

2.0 EVALUATION

The regulations for nuclear industry codes and standards are stated in 10 CFR 50.55a. By rulemaking published June 12, 1971, effective July 12, 1971, 10 CFR 50.55a was issued to establish minimum quality standards for the design, fabrication, erection, construction, testing, and inspection of certain systems and components of boiling and pressurized water-cooled nuclear power reactor plants by requiring conformance with appropriate industry codes and standards. The regulations have been revised a number of times since first promulgated with design requirements added to ensure access for inspection and testing. Before March 15, 1976, the regulations contained no requirements for IST of pumps and valves. The ASME Code first included Subsections IWP and IWV to Section XI in the Summer 1973 Addenda. The rules, which became effective March 15, 1976 [published February 12, 1976 (41 FR 6256)], required that an operating license for a utilization facility be subject to the conditions specified in 10 CFR 50.55a(g), which included requirements for the ISI of components and the new IST of pumps and valves. The regulations provide for alternatives to the requirements if compliance would result in hardship without a compensating increase in the level of quality and safety, or if the proposed alternatives would give an acceptable level of quality and safety. Also, because a number of plants were designed before the ISI and IST requirements were imposed and therefore may not have included all the necessary access provisions, the regulations provide for relief from Code requirements if a licensee determines that conformance is

impractical for its facility. These provisions are stated in paragraphs (a)(3)(i), (a)(3)(ii), (f)(6)(i), and (g)(6)(i) of 10 CFR 50.55a.

After publishing the rules that took effect March 15, 1976, the NRC issued letters to licensees informing them of the rule change and recommending that they propose technical specification changes for both ISI and IST with the following standard statements:

The following language should be substituted, as appropriate, into the Technical Specifications where existing surveillance requirements are superseded by ASME Section XI inservice inspection and testing requirements:

- a. Inservice inspection of ASME Code Class 1, Class 2, and Class 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).
- b. Inservice testing of ASME Code Class 1, Class 2, and Class 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 50.55a(g), except where specific written relief has been granted by the NRC pursuant to 10 CFR 50, Section 50.55a(g)(6)(i).

In the letters issued to plants then operating, the NRC further discussed the regulation which, at that time, required updates of the ISI programs at 40-month intervals and the IST programs at 20-month intervals. The NRC suggested that licensees submit requests for relief from ASME Code requirements as far in advance as possible of the start of any 20-month period for testing pumps and valves but at least 90 days before that period (these inspection and testing periods were later changed to 120-month intervals for both ISI and IST). The NRC stressed the need to incorporate 10 CFR 50.55a(g) by reference in TS (1) to avoid duplication of requirements, (2) to alleviate the need for TS changes whenever a testing program is updated, and (3) to simplify the process for obtaining relief from impractical ASME Code requirements.

The NRC discussed relief requests as follows in the letters to licensees:

Generally, the licensee will know well in advance of the beginning of any inspection period, whether or not a particular ASME Code requirement will be impractical for his facility. Thus, the licensee should request relief from ASME Code requirements as far as possible in advance of, but not less than 90 days before, the start of the inspection period. Early submittals are particularly important for the first 40-month inservice and 20-month pump and valve testing period because they will enable the NRC staff to evaluate the information received from all licensees and determine

which ASME Code requirements may be generally impractical for various classes of plants. Early submittals will thereby facilitate earlier feedback to licensees regarding the acceptability of their requests.

The NRC Staff recognizes that it will not be possible in all cases for a licensee to determine in advance that any particular ASME Code requirement will be impractical for his facility. In cases where, during the process of inservice testing, certain requirements are found to be impractical due to unforeseen circumstances, the licensee may request relief at that time. These occurrences are not expected to be many and are expected to result in only minor changes to an inservice testing program.

All relief from ASME Code requirements that are determined to be impractical for a facility will be granted in the form of a letter within the provisions of §50.55a(g)(6)(i). This written relief should be incorporated into the document describing the inservice inspection and testing program retained by the licensee.... the written relief itself will not become an explicit part of the facility license.

While developing the revised standard TS, the NRC approved a change from the ISI and IST surveillance requirements as originally proposed in the 1976 letters to licensees. The standard TS change corrected what appeared to be a more restrictive limitation than the regulatory requirements of 10 CFR 50.55a in prohibiting the licensee from implementing relief for impractical Code requirements before obtaining approval from the NRC. The administrative section of the revised standard TS includes the following applicable requirements for the ISI and IST programs:

#### 5.7.2.11 Inservice Inspection Program

This program provides controls for inservice inspection of ASME Code Class 1, 2, and 3 components, including applicable supports. The program shall include the following:

- a. Provisions that inservice inspection of ASME Code Class 1, 2, and 3 components shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;...

#### 5.7.2.12 Inservice Testing Program

This program provides controls for inservice testing of ASME Code Class 1, 2, and 3 components including applicable supports. The program shall include the following:

- a. Provisions that inservice testing of ASME Code Class 1, 2, and 3 pumps, valves, and snubbers shall be

performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a;...

The revised standard TS reflect the position that the licensee must establish and implement the program in accord with 10 CFR 50.55a. For preparing an updated ISI or IST program, the regulations allow a licensee up to a full year after the beginning of the updated interval to obtain NRC approval of relief from those Code requirements that the licensee has determined are impractical for its facility and are not included in the revised ISI or IST program. The regulations state that the need for relief be demonstrated to the satisfaction of the Commission no later than 12 months from the interval start date. If later in the interval a licensee finds a specific need for relief, the licensee should submit the request for NRC approval.

The licensee proposes to delete the phrase "except where specific written relief has been granted by the Commission pursuant to 10 CFR 50, Section 50.55a(g)(6)(i)." The revised TS will also eliminate the reference to Section 50.55a(g) and reference Section 50.55a to reflect the separation between ISI and IST that was effective in the most recent rulemaking to Section 50.55a. Requirements for IST are now addressed in Section 50.55a(f) while requirements for ISI remain in Section 50.55a(g). The bases for the TS have been changed accordingly. WNP-2 TS 4.0.5 will read as follows:

Surveillance Requirements for inservice inspection and testing of ASME Code Class 1, 2, and 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.

For 120-month updated programs, relief requests should be submitted before the interval start date to allow a period for NRC review 12 months after the interval start date (i.e., the updated program should be submitted 3 to 6 months before the start date, or earlier). On determining that a requirement is impractical and not included in the revised inservice test or inspection program, the licensee must follow the requirements of 10 CFR 50.55a(f)(5)(iv) or (g)(5)(iv), as applicable. The change to the specification does not allow the licensee to implement alternative testing under 10 CFR 50.55a(a)(3)(i) and (a)(3)(ii) until the NRC has determined that such alternatives are authorized and has issued a safety evaluation to the licensee. However, this TS change will enable licensees to avoid situations where compliance with the current TS cannot be achieved for the period between when the licensee prepares and submits a relief request as part of a revised inservice test or inspection program during the first 12 months of the program and when the NRC issues a safety evaluation and grants the relief. This situation could occur at the beginning of a new interval.



Following implementation of the TS change, when a Code requirement is practical but an alternate method is requested, approval from the NRC is required before implementing the alternative method of testing (1) proposed to achieve levels of quality and safety equivalent to those of the Code method or (2) proposed to avoid an undue hardship without yielding a compensating increase in the level of quality and safety. Additionally, for IST, the licensee may use the guidance in Generic Letter 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," for alternatives that the staff has determined are acceptable for implementation.

In the letter dated August 8, 1994, accompanying the amendment application, the licensee discussed the guidance in draft NUREG-1482, "Guidelines for Inservice Testing at Nuclear Power Plants." Draft NUREG-1482 was published for comment in consideration of publishing the report in final form to give guidance on IST issues. The staff is evaluating the comments received and has not published the report in final form yet. Additional staff guidance, if any, on IST and ISI issues will be published in an appropriate document at such a time as such guidance or recommendations are available. However, notwithstanding any guidance or recommendations published by the staff, NRC requirements regarding the ASME Boiler and Pressure Vessel Code are as set forth in the regulations at 10 CFR 50.55a.

The licensee also proposes to add a definition for the phrase "biennially, or every two years," as "[a]t least once per 731 days." This change is a reasonable statement of this periodicity and is acceptable.

### 3.0 STATE CONSULTATION

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 and 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 (59 FR 56558). 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 CONCLUSION

The Commission has 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, (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: P. Campbell, NRR/DE/EMEB

Date: January 5, 1995