

REGULATORY INFORMATION DISTRIBUTION SYSTEM (RIDS)

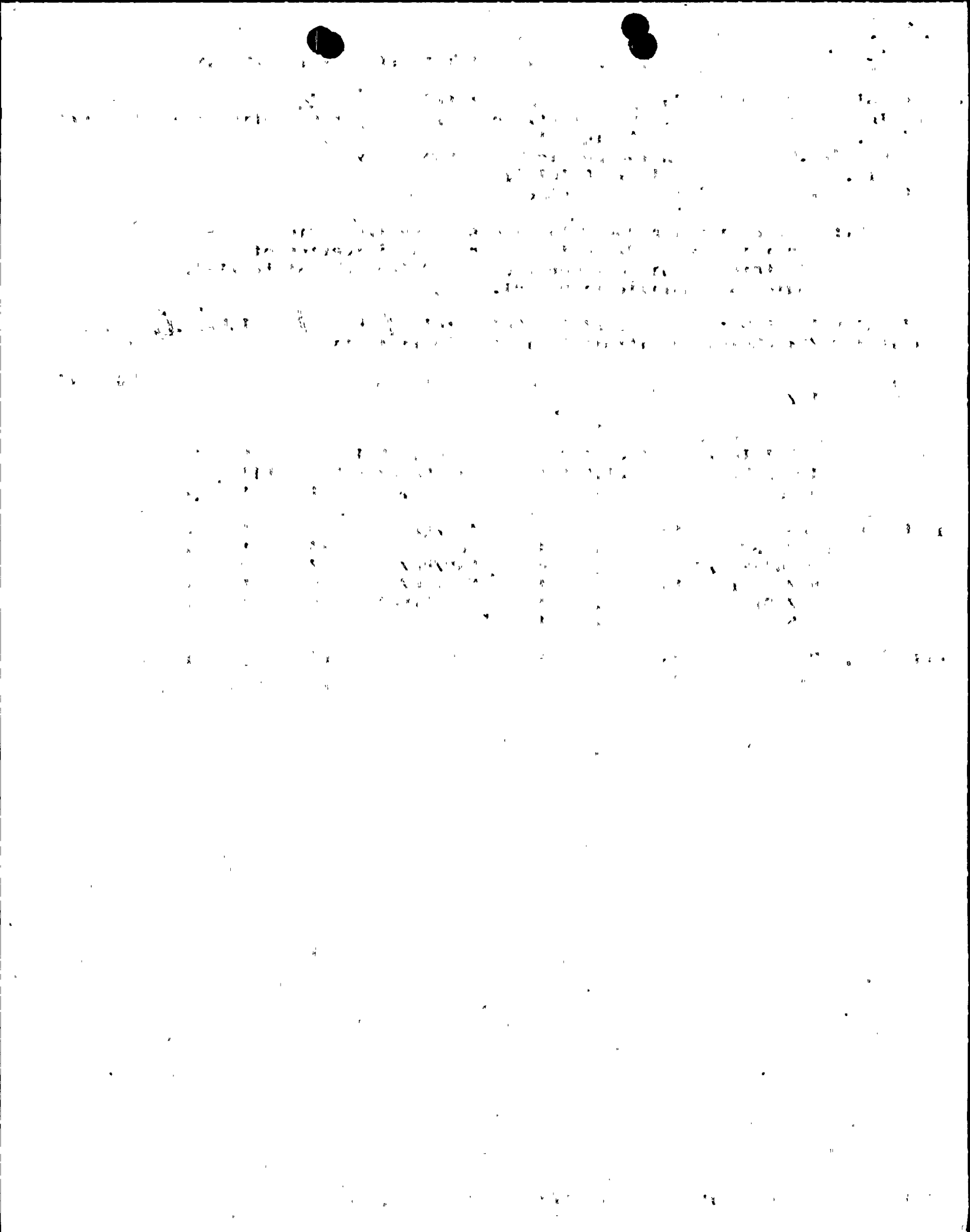
ACCESSION NBR: 8502050078      DOC. DATE: 85/01/30      NOTARIZED: NO      DOCKET #  
 FACIL: 50-397 WPPSS Nuclear Project, Unit 2, Washington Public Powe      05000397  
 AUTH. NAME      AUTHOR AFFILIATION  
 SORENSEN, G.C.      Washington Public Power Supply System  
 RECIP. NAME      RECIPIENT AFFILIATION  
 SCHWENCER, A.      Licensing Branch 2

SUBJECT: Application for amend to License NPF-21, changing  
 Condition 28 deadline for environ qualification of  
 electrical equipment per 10CFR50.49 from 850331 to 1130.  
 Equipment Justification encl.

DISTRIBUTION CODE: A048D      COPIES RECEIVED: LTR 1 ENCL 1      SIZE: 116  
 TITLE: OR/Licensing Submittal: Equipment Qualification

NOTES:      05000397  
 OL: 12/20/83

	RECIPIENT ID CODE/NAME		COPIES LTTR ENCL		RECIPIENT ID CODE/NAME		COPIES LTTR ENCL
	NRR LB2 BC	12	1	0	AULUCK, R	01	1 1
INTERNAL:	ACRS	15	8	8	ADM/LFMB		1 0
	ELD/HDS2	12	1	1	GC	13	1 1
	NRR KARSCH, R		1	1	NRR/DE/EQB	07	2 2
	NRR/DL DIR	14	1	1	NRR/DL/ORAB	06	1 1
	NRR/DSI/AEB		1	1	<u>REG FILE</u>	04	1 1
	RGN5		1	1			
EXTERNAL:	LPDR	03	1	1	NRC PDR	02	1 1
	NSIC	05	1	1			



## Washington Public Power Supply System

P.O. Box 968 3000 George Washington Way Richland, Washington 99352 (509) 372-5000

January 30, 1985  
G02-85-048

Docket No. 50-397

Director of Nuclear Reactor Regulation  
Attention: Mr. A. Schwencer, Chief  
Licensing Branch No. 2  
Division of Licensing  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Mr. Schwencer:

Subject: NUCLEAR PLANT NO. 2  
OPERATING LICENSE NPF-21, REQUEST FOR  
AMENDMENT TO LICENSE CONDITION (28)

Reference: 1) Letter, UL NRC-1006, D. F. Schnell (Union Electric Company) to H. R. Denton (NRC), "Callaway Plant Unit 1, Revision to License Condition 2.C.(3)(a)", dated December 28, 1984.  
2) Letter, G02-85-021, G. C. Sorensen (SS) to A. Schwencer (NRC), "Operating License NPF-21, Request for Amendment to License Condition (28) and Environmental Qualification 10 CFR 50.49(h) Notification", dated January 17, 1985

This amendment application requests that the March 31, 1985 deadline stated in the subject license condition be changed to November 30, 1985. At present, License Condition (28) requires that "prior to March 31, 1985, the licensee shall environmentally qualify all electrical equipment according to the provisions of 10 CFR 50.49". Recent discussions with the Staff indicate that the appropriate section of the rule applicable to WNP-2 is 10 CFR 50.49(i) which does not stipulate a qualification deadline for applicants granted licenses on or after February 22, 1983. (The WNP-2 license was issued December 20, 1983.)

The March 31, 1985 date is mentioned in 10 CFR 50.49(g) which is applicable to "each holder of an operating license issued prior to February 22, 1983". Since the rule does not appear to impose the March 31, 1985 deadline on the WNP-2 license, the requested amendment does not involve an exemption to 10 CFR 50.49. In fact, consistent with the request, 10 CFR 50.49(g) permits the Staff to extend the compliance deadline to November 30, 1985, for those operating licenses issued prior to February 22, 1983, where appropriate JIO's are provided.

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A. Schwencer  
Page Two  
January 30, 1985  
REQUEST FOR AMENDMENT TO LICENSE CONDITION (28)

Although the deadlines given in 10 CFR 50.49(g) are not expressly applicable to WNP-2, it is understood that:

- a) explicit Commission approval is required for extensions past November 30, 1985; and,
- b) precedents have been established in recently issued operating licenses that included the November 30, 1985 qualification deadline.

Specifically, NPF-23 issued to Byron Station Unit 1 has November 30, 1985 as the environmental qualification deadline. Additionally, Callaway Plant Unit 1, NPF-30, has recently requested the same change to the license condition addressing environmental qualification in the Callaway license (Reference 1).

In support of this amendment request, the Supply System has reviewed all the JIO's applicable to WNP-2 and concluded that they will remain valid and effective through November 30, 1985. The Supply System review of the Justification for Interim Operation reveals that Table A, Page 3 should include CIA-V-39A. Equipment Justification #2 discusses and includes justification for this valve. Further justification is not necessary. Additionally, Page A-27 should include REA-E/P-1A. A Justification for Interim Operation is attached for this device. The discussions provided by these JIO's ensure that the plant can be safely operated pending completion of equipment qualification. The issue at question is not one of compliance with the regulation, rather it is the date by which the compliance is achieved. It is noted that the Staff has concluded that the Supply System has demonstrated conformance with the qualification requirements of 10 CFR 50.49 (Supplement 4 to WPPSS Nuclear Project No. 2 Safety Evaluation Report, NUREG-0892, Section 3.11.5).

Pursuant to the above information, this amendment request does not adversely affect or endanger the health of the general public and does not involve an unreviewed safety question.

The Supply System has reviewed this change per 10 CFR 50.92 and the guidance provided by the Staff in applying the standards of 10 CFR 50.92 (48 FR 14870) and determined that this change does not involve a significant hazard. This change is similar to the example of an action involving no significant hazards consideration which relates to a change to make the license conform to regulations, where the license amendment results in very minor changes to facility operations clearly in keeping with the regulations.



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A. Schwencer  
Page Three  
January 30, 1985  
REQUEST FOR AMENDMENT TO LICENSE CONDITION (28)

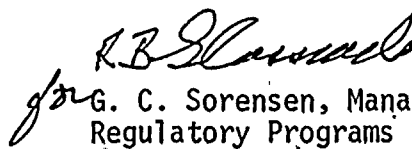
This amendment request does not involve a significant increase in the probability or consequences of an accident or other adverse condition over previous evaluations (the requested amendment does not constitute a significant change to the licensing basis of the plant); nor create the possibility of a new or different kind of accident or condition over previous evaluations (no changes are being made to any equipment and/or systems, and therefore no new or different kinds of accidents would be made possible); nor involve a significant reduction in a margin of safety (no original design parameters are being reduced). Based on the foregoing, the requested amendment does not present a significant hazard.

It should be noted that this request supercedes that requested in Reference 2 and the warrant provided with Reference 2 should be applied as initial payment for this amendment request per 10 CFR 170.21 Category A (Power Reactors).

In accordance with 10 CFR 50.91, the State of Washington has been provided a copy of this letter.

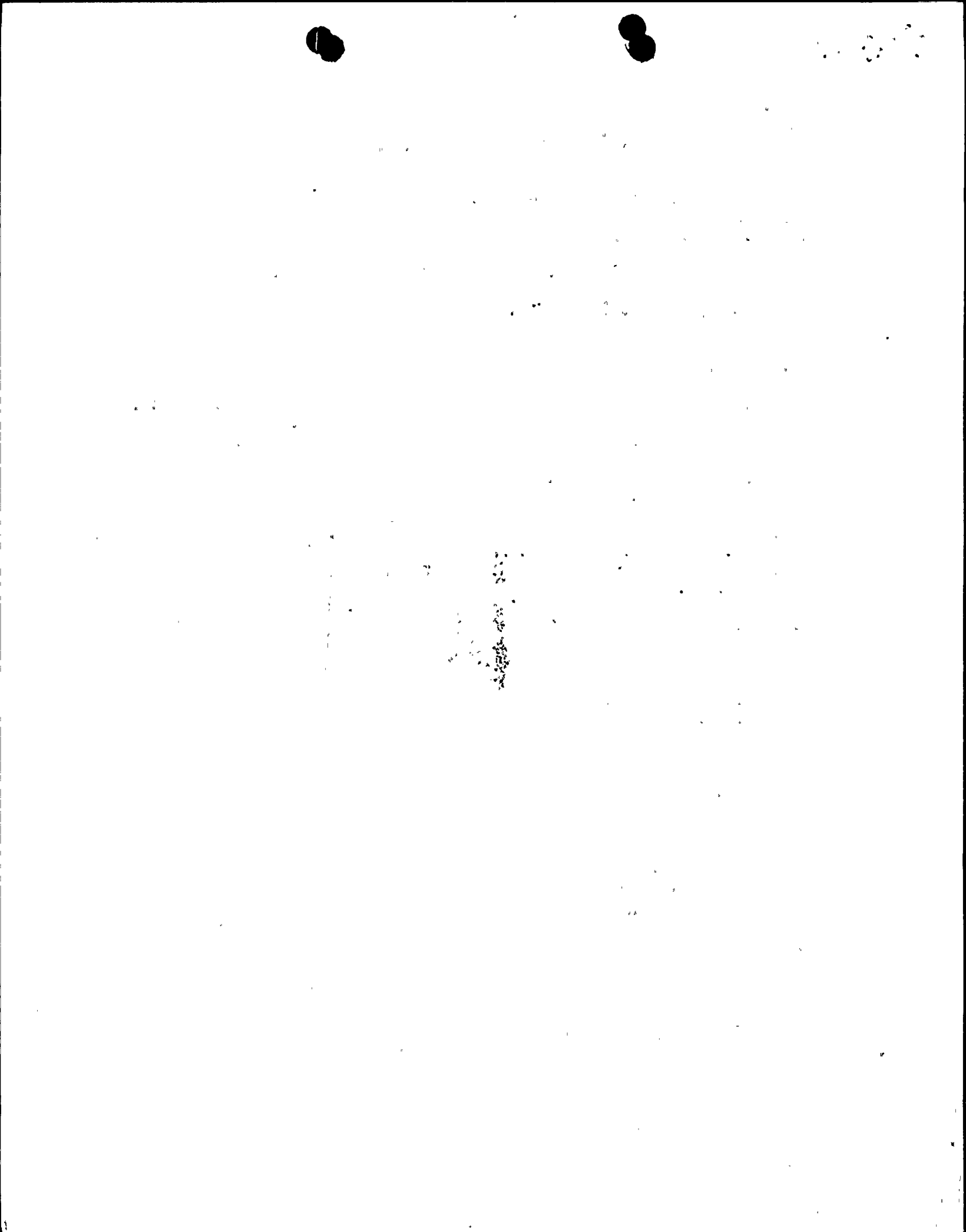
Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing. As you are aware, prompt attention to this amendment is necessary; continued operation of WNP-2 requires approval of this amendment no later than March 31, 1985.

Very truly yours,

  
G. C. Sorensen, Manager  
Regulatory Programs

PLP/tmh

cc: R Auluck - NRC  
WS Chin - BPA  
N Lewis - EFSEC  
JB Martin - NRC RV  
A Masciantonio - NRC  
AD Toth - NRC Site





## EQUIPMENT JUSTIFICATION

### 1.0 COMPONENT IDENTIFICATION

EPN: REA-E/P-1A

Description: Fan Damper Electro-Pneumatic Converter

Manufacturer/Model: Moore Industries/77-16

### 2.0 ACCIDENT CONDITIONS

	<u>Temperature</u>	<u>Relative Humidity</u>
Accident Profile:	#4	#4, 21X
Use Code: 2G1		
Operability Time:	4320 Hours	
Radiation Zone:	572C	
Zone Dose:	$3.0 \times 10^4$	

### 3.0 COMPONENT SAFETY FUNCTION

This passive device must maintain electrical integrity during a high humidity condition resulting from a high energy line break for 24 hours.

### 4.0 QUALIFICATION STATUS

#### 4.1 Summary of Qualification Status

REA-E/P-1A is located in a relatively mild environment for temperature and pressure. It is exposed to 100% relative humidity due to High Energy Line Break. The equipment has not been tested for 100% relative humidity.

The equipment is to be replaced with equipment with available qualification documentation.

#### 4.2 Parameters Requiring Justification

Humidity.

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1951  
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## 5.0 JUSTIFICATION FOR INTERIM OPERATION

The component is rated as NEMA 3R, which means it can be applied in outdoor use and has passed rain tests. Additionally, the transducer's exhaust provides an air purge of the terminal enclosure. The duration of the accident during which it would experience high relative humidity is short (i.e., 24 hours). The equipment is required only to maintain electrical integrity for this period. No significant degradation is likely to occur which would compromise this minimal function during this period.

## 6.0 CONCLUSION

Interim operation is justified on the following basis:

The device housing is resistant to water, the duration of the high humidity condition is short, and the required function is likely to be protected.

WNP-2 OL NPF-21  
REQUEST FOR LICENSE  
AMENDMENT TO LICENSE  
CONDITION (28)

STATE OF WASHINGTON )  
                          )  
County of Benton     )

Subject: \_\_\_\_\_

I, R. B. GLASSCOCK, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information and belief the statements made in it are true.

DATE January 31, 1985

R. B. Glasscock  
R. B. Glasscock, Director  
Licensing and Assurance

On this day personally appeared before me R. B. GLASSCOCK to me known to be the individual who executed the foregoing instrument and acknowledge that he signed the same as his free act and deed for the uses and purposes therein mentioned.

GIVEN under my hand and seal this 31 day of January, 1985.

Kathryn E. Ford  
Notary Public in and for the  
State of Washington

Residing at Richland, Washington

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