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

SAFETY EVALUATION

AMENDMENT NO. 8

WPPSS NUCLEAR PROJECT NO. 2

DOCKET NO. 50-397

INTRODUCTION

By letters dated January 11 and January 17, 1985, and as supplemented by letters dated January 30 and March 8, 1985, the licensee requested changes to the License Conditions 2.C.(16) and 2.C.(28) of the WNP-2 license NPF-21.

EVALUATION

License Condition 2.C.(28) has been revised to incorporate a November 30, 1985 deadline for completion of environmental qualification of electrical equipment important to safety instead of the presently imposed March 31, 1985 deadline. By letters dated January 17, January 30 and March 8, 1985, the licensee stated that due to design changes, delays in procurement, test complications, and installation problems, environmental qualification of certain equipment will not be completed by March 31, 1985. Specifically, the licensee requested extension for the following equipment:

1. Level Transmitters
   MS-LITS-26A, 26B, 26C, and 25D
2. Solenoid Valves
   PSR-V-X77A/1 and -X77A/3
3. Remote Manual Switch
   RRA-RMS-FN/1,-FN/2 and -FN/3
4. Electro/Pneumatic Converters
   REA-E/P-1A and -1B
5. Pressure Switch
   LPCS-PIS-1
6. Motor Operator
   RCIC-MO-V/63
7. Motor Operator
   RCIC-MO-V/1
8. Valve CIA-V-39A
9. LPRM Detectors and Connectors

For the above items, the licensee has previously submitted or has provided Justification of Interim Operation (JIO's), which have addressed the requirements of 10 CFR 50.49. The staff has reviewed these JIO's and agrees with the licensee' assertion that they will support continued operation pending completion of environmental qualification. The licensee plans to complete the qualification of all equipment in accordance with the requirements of Section 50.49 during the scheduled outage from mid-May to mid-July, 1985 but no later than November 30, 1985.

The licensee has identified neutron flux as a Type A variable as defined in Regulatory Guide 1.97. The instrumentation used to display Type A variables is required to conform to Category 1 design and qualification criteria which includes environmental qualification in accordance with 10 CFR 50.49. By letter GO2-83-693 dated August 3, 1983, the licensee requested to defer installation of qualified source range monitors (SRMs) until the first refueling outage, scheduled for mid 1986. The basis for the request was that qualified replacements for the existing SRMs did not exist in industry, and that the delay would allow sufficient time to complete qualification of one of several designs being developed at the time. The staff approved deferral of installation of qualified SRMs, but only until March 31, 1985 instead of the first refueling outage as requested by the licensee because, in part that was the goal for final environmental qualification of electric equipment for operating reactors. It should be noted that the remainder of the instrumentation upgrades required as a result of the RG 1.97 review do not have to be implemented until the first refueling outage as set forth in enclosure 2, Item 3a of License Condition 2.C.16. By letter GO2-85-014 dated January 11, 1985, the licensee again requested to defer installation of qualified SRMs to the first refueling outage. The basis for this request continues to be the unavailability of a completely qualified SRM. The licensee has indicated that deferral until the first refueling outage will allow them to evaluate available alternatives and install qualified SRMs.

March 31, 1985 is the date given in 10 CFR 50.49 for electrical equipment important to safety installed at operating reactors to be environmentally qualified for its environment. This date is not a deadline for implementation (installation or upgrade) of instrumentation required to bring WNP-2 into conformance with the recommendations of RG 1.97. Modifications required as a result of RG 1.97 are to be implemented on a plant specific schedule agreed to by the staff and the licensee that takes into account plant workloads, and optimizes the use of utility and NRC resources (see Supplement 1 to NUREG-0737, Requirements for Emergency Response Capability - Generic Letter 82-33). Instrumentation designed to Category 1 requirements in accordance with RG 1.97 which is installed after March 31, 1985, must be environmentally qualified at the time of installation. The licensee is not requesting an exemption or deviation from either the requirements of RG 1.97 or the environmental qualification rule (10 CFR 50.49). Therefore, a justification for continued operation (JCO) is not necessary. The licensee intends to replace the existing SRMs with fully qualified SRMs prior to startup following the first refueling. The existing flux monitoring instrumentation consists of four redundant safety related channels, with the exception of environmental qualification, similar to those used in other operating BWRs. The licensee has stated that in the unlikely event of an accident condition prior to replacement, there are additional systems in place that will provide the operators with sufficient data to assess reactor conditions (e.g.,

control rod position monitors, reactor vessel and pressure monitors, etc.):

The staff recognizes that environmental qualification of SRMs is an industry development item. The staff has allowed delays for implementation of specific RG 1.97 instrumentation items if adequate justification for the delays and commitments to install the qualified instrumentation within a reasonable time are received from the licensee. Based on our review of information provided by the licensee, we find their request to defer installation of qualified SRMs until the first refueling outage (consistent with the implementation date for other RG 1.97 instrumentation) to be acceptable, and conclude that the existing instrumentation is acceptable for interim operation.

ENVIRONMENTAL CONSIDERATION

This amendment involves a change to a requirement with respect to installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that the amendment involves no significant change in the types or significant increase in the amounts of any effluents that my 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 Section 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.

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 the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

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