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AUTH.NAME AUTHOR AFFILIATION
SORENSEN,G.C. Washington Public Power Supply System
RECIP.NAME RECIPIENT AFFILIATION
BUTLER,W.R. Licensing Branch 2

SUBJECT: Application for amend to License NPF-21,License Condition 18,eliminating high drywell pressure signal from automatic depressurization sys initiation logic,thereby making low pressure ECCS qualified as high pressure sys.Fee paid. 4+6

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

May 16, 1985
G02-85-251

Docket No. 50-397

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

Dear Mr. Butler:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS FOR AUTOMATIC DEPRESSURIZATION SYSTEM (ADS) LOGIC MODIFICATIONS, LICENSE CONDITION 18

Reference: Letter, G02-85-181, G. C. Sorensen (SS) to A. Schwencer (NRC), dated March 29, 1985

The subject license condition requires that prior to startup following the first refueling outage, the Supply System shall:

(a) Install modifications to the ADS acceptable to the NRC;

(b) Incorporate into the Plant Emergency Procedures the usage of the inhibit switch; and

(c) Provide Technical Specifications for the bypass timer setting and surveillance requirements for the bypass timer and the manual inhibit switch.

The ADS logic modification adopted by the Supply System and approved by the NRC is referred to as BWROG Option 2. It was approved as evidenced in Supplement No. 4 to the WNP-2 SER (NUREG-0892), paragraph 6.3.6.

The purpose of this letter is to clarify the Supply System's position that the license conditions and technical specifications are equivalent; i.e., compliance with a license condition that conflicts with a technical specification requirement does not place the Supply System in noncompliance with our license.

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To comply with the requirements of 10 CFR 50.49, the high drywell pressure signal was eliminated from the ADS initiation logic, thereby making ADS and a Low Pressure ECC System qualified as a high pressure system (Reference). This portion of the modification results in the technical specification reference to the ADS Drywell Pressure - High instrumentation (including set-points and surveillance requirements) not being required. It is the Supply System's position that this change has prior approval as specified in License Condition 18 and any resultant deletions to the Technical Specifications would be a purely administrative change to the license which can be handled the same as if it were a clerical error (i.e., impossible to perform and therefore by mutual agreement can be disregarded until a change could be implemented on a convenient schedule).

The remainder of the modification which will add the manual inhibit switch will be accomplished during the May to June 1985 maintenance outage. This will provide for full compliance to License Condition 18 one full year before the first scheduled refueling outage. The Supply System believes that this portion of the change is also clearly authorized, including any resultant technical specification changes based again on the compliance requirement of License Condition 18. Supplement No. 4 to the SER refers to the addition of the inhibit switch to the technical specifications. Since the installation of the inhibit switch may require an addition to the technical specification as opposed to merely a deletion and in consideration of the relationship between the technical specifications and the license condition, there is sufficient uncertainty as to prompt a submittal to request a technical specification amendment for the addition of the inhibit switch surveillance requirements. At the same time, this is the first convenient opportunity to delete the references to the drywell pressure - high instrumentation. For the aforementioned reasons, pages 3/4 3-26, 3-27, 3-30, 3-31, 3-34, and 3-35 are herewith submitted with appropriate changes noted. The recommended testing requirements for the inhibit switch concur with the instruments for the Channel Functional Test (CFT) and the manual initiation switch for the channel check and calibration requirements. The appropriate changes will be made to our technical specification surveillance procedures.

It should also be noted that License Condition 18 refers to <u>submittal</u> of the technical specification change versus NRC approval of the change, which supports the relationship between the actual technical specification and license condition as being equivalent.

Since the ADS logic modification has had considerable NRC review over the past several years (originally item II.K.3.18 from NUREG-0737), the change itself (including the surveillance requirements if required) should be pro forma and easily expedited. This would allow the approval process for this technical specification amendment to be concluded, if it is determined to be required, in sufficient time for the amendment to be in place prior to June 21, 1985, the time presently planned for startup following the completion of the present outage. If the NRC is not able to complete their review/approval process within this amount of time, the Supply System requests that an exigent circumstance be

declared and the formal amendment be granted immediately. This is easily justified since the specific change being implemented has already had several years of Owners' Group activity and has been approved by the NRC, therefore, an extended review period serves no purpose. It is important that this amendment not be an impediment to startup following this outage, as the Bonneville Power Administration is expecting WNP-2 back on line June 21, 1985 following the spring runoff period to offset the decrease in hydroelectric capacity. It is, therefore, in the best interest of the general public, and especially the Pacific Northwest.

The Supply System also plans to incorporate into the Plant Emergency Procedures the usage of the inhibit switch prior to startup following the present outage, which will satisfy License Condition 18.

The Supply System has reviewed this change per 10 CFR 50.59 and determined that no unreviewed safety questions will result from this amendment.

On April 6, 1983, the NRC published guidance in the Federal Register (48 FR 14870) concerning examples of amendments that are not likely to involve significant hazards consideration. One such example, (vii) involves a change "... to make a license conform to changes in the regulations, where the license change results in very minor changes to facility operations clearly in keeping with the regulations." Accordingly, the proposed change to the technical specifications involves no significant hazards consideration.

The Supply System has evaluated this request in accordance with the criteria contained in 10 CFR 170.21 and has included a warrant for One hundred fifty dollars ($150.00) as initial payment for this application for amendment to Facility Category A (Power Reactors).

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

This technical specification change has been reviewed and approved by the WNP-2 Plant Operations Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB). Should you have any questions, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

G C Sorensen

G. C. Sorensen, Manager
Regulatory Programs

HLA/tmh
Attachments

cc: JO Bradfute - NRC
WS Chin - BPA
C Eschels - EFSEC
JB Martin - NRC RV
E Revell - BPA
AD Toth - NRC Site

WNP-2, OL NPF-21, Request for Amendment to Tech. Specs. for Automatic Depressurization System (ADS) Logic Modifications, License Condition 18

STATE OF WASHINGTON)
)
County of Benton)

Subject:

I, G. C. SORENSEN, 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 16 MAY, 1985

GC Sorensen
G. C. Sorensen, Manager
Regulatory Programs

On this day personally appeared before me G. C. SORENSEN 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 16th day of May, 1985.

Kathryn H. DuBois
Notary Public in and for the
State of Washington

Residing at Richland, WA
March 1979