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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,requesting emergency Tech Specs change to reflect installation of larger fuses in primary containment penetration conductor overcurrent protective devices.Fee paid.

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

June 18, 1985
G02-85-321

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
REQUEST FOR EMERGENCY TECHNICAL SPECIFICATION CHANGE TO TECHNICAL SPECIFICATION 3.8.4.2, PRIMARY CONTAINMENT PENETRATION CONDUCTOR OVERCURRENT PROTECTIVE DEVICES

Reference: Letter, G02-85-312, G. C. Sorensen (SS) to W. R. Butler (NRC), Same Subject, dated June 13, 1985

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby requests an emergency change to the WNP-2 Technical Specifications. Specifically, the Supply System is requesting a change to Technical Specification 3.8.4.2.

Testing for the first eighteen (18) month surveillances required by the WNP-2 Technical Specifications is now in progress. As a result, Surveillance Requirement 4.8.4.2.a.3 has prompted a review of the fuses listed in Table 3.8.4.2-1 (revised in Amendment 6 dated October 12, 1984 due to a change request from March 9, 1984). This review disclosed that as a result of certain plant modifications the fuses listed in the Table were replaced with larger fuses. Supply System design change procedures have ensured in all such cases that the new fuse sizing is within the design bases. A safety analysis has been performed on each change to confirm that the design change remains within the design margin of the plant.

The Supply System first became aware of the possible need for the requested technical specification change on June 6, 1985 and immediately commenced the internal review procedure which resulted in the request submitted in the referenced letter. We understand the changes requested by the referenced letter can not be granted prior to plant startup. Therefore, in view of the

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need for plant technical specifications to conform with actual plant configuration prior to startup, the Supply System is requesting the attached changes be processed on an emergency basis and the changes submitted in the referenced letter be approved through the normal process contemplated by Section 50.91. Accordingly, the Supply System hereby requests an emergency change be granted in accordance with 10 CFR Parts 50.91(a)(5) and 2.106 to support WNP-2 starting up on June 21, 1985. Again, this request is being sought promptly after the need for the technical specification modification was identified and the Supply System has not created this emergency to take advantage of Section 50.91(a)(5). It appears in the judgment of the Supply System that startup will be delayed unless the requested amendment is granted by June 21, 1985. It should be noted that the potential for missing the June 21 startup date exists. This potential has been discussed with members of your staff and as soon as a definite change is realized your staff will be informed.

The fuses listed in the proposed Table 3.8.4.2-1 (attached) have been changed to reflect design changes made to plant equipment. The fuses have been sized to ensure service to the associated equipment yet still be within the design margin of the containment penetration assembly. As designs to electrical loads within containment are revised to support plant modifications these fuses will be changed, however at all times within the control of the WNP-2 design process, to ensure continued design margin.

The Supply System has reviewed this change per 10 CFR 50.59 and determined that no unreviewed safety questions will result from this amendment. This technical specification change has been reviewed and approved by the WNP-2 Plant Operations Committee and the Supply System Corporate Nuclear Safety Review Board.

The Supply System has reviewed this change per 10 CFR 50.92 and determined that it does not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the changes are within the design margin. Previously evaluated events will remain bounding. Therefore no increases in probability or consequence is conceivable.

2) Create the possibility of a new or different kind of accident than previously evaluated because no new accident scenarios are credible. All changes remain within design margin and installed equipment to respond to accidents remains the same.

3) Involve a significant reduction in a margin of safety because the sizing of fuses within the design margin does not encroach on the overall margin of safety.

This change does not involve a significant hazards consideration. Example (i) P 14870 of the Federal Register, April 6, 1983, is cited as justification. This change is administrative in that it changes the technical specification to achieve consistency with plant design. The plant has been modified within the design margin and the technical specifications would be in error were these changes not made.

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 under Facility 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.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh
Attachments

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

STATE OF WASHINGTON)
)
County of Benton)

Subject: Emerg. Tec. Spec. Change
8.8.4.2

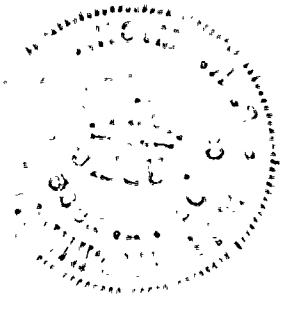
I, G. C. Sorensen, being duly sworn, subscribe to and say that I am the Manager, Regulatory Programs for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information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

DATE 18 June, 1985

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 18 day of June, 1985.

Notary Public in and for the
State of Washington

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