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AUTH. NAME AUTHOR AFFILIATION
SORENSEN, G. C. Washington Public Power Supply System
RECIP. NAME RECIPIENT AFFILIATION
ADENSAM, E. G. BWR Project Directorate 3

SUBJECT: Application for amend to License NPF-21, revising Tech Spec Surveillance Requirement 4.6.1.2.d & authorizing exemption from 10CFR50, App J, Section III.D re Type B test of drywell head O-rings until Spring 1986 refueling outage. Fee paid.

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Washington Public Power Supply System
3000 George Washington Way P.O. Box 968 Richland, Washington 99352-0968 (509)372-5000

January 17, 1986
G02-86-082

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attention: Ms. E. G. Adensam, Project Director
BWR Project Directorate No. 3
Division of BWR Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Ms. Adensam:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21, REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 4.6.1.2.d, AND EXEMPTION TO APPENDIX J TO 10CFR50 SECTION III.D REGARDING TYPE B TEST OF DRYWELL HEAD "O" RINGS

The subject surveillance requirements and Appendix J section specify that type B and C leak rate tests are to be conducted at intervals no greater than 24 months. The WNP-2 drywell head "O" ring type B test was last completed March 19, 1984, making the next test due no later than March 19, 1986. This test requires plant shutdown and shield plug removal to allow access. In consideration of the WNP-2 refueling outage scheduled for spring 1986, the Supply System proposes that a one-time-only technical specification amendment and Appendix J exemption be authorized to allow this test to be accomplished during the forthcoming refueling outage.

As indicated in previous Appendix J exemption requests (Tennessee Valley Authority Browns Ferry Unit 2 and Carolina Power & Light Brunswick Unit 1 requests posted in the Federal Register Volume 49, No. 160, 8/16/84 and Volume 49, No. 242, 12/14/84, respectively), relaxation to the 24 month limit to permit test conduct during refueling outages has been previously granted. The Supply System considers a plant shutdown exclusively for this test with a refueling outage scheduled within weeks of the two year date to be unnecessary.

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AMENDMENT TO TECH. SPEC. SURV. REQUIREMENT 4.6.1.2.d AND EXEMPTION TO APPENDIX J TO 10CFR50 SECTION III.D - TYPE B TEST OF DRYWELL HEAD "O" RINGS

Accordingly, per 10 CFR 50.90 and 2.101, the Supply System requests the subject technical specification surveillance requirement be amended as attached and a one-time-only exemption per 10 CFR 50.12(a) to Appendix J be granted to defer the type B leak rate test on the drywell head "O" rings from March 19, 1986 until the spring 1986 refueling outage. The spring 1986 refueling outage is presently scheduled to begin April 15, 1986. However, as previously related to the staff, WNP-2 provides power to the Bonneville Power Administration (BPA) grid which is seasonally affected by hydroelectric capacity. As a result, depending on BPA forecasts for the spring runoff, the Supply System may be directed to stay on-line beyond the scheduled date or commence the outage earlier. It is not anticipated that the spring outage, if deferred, will be delayed beyond May 15, 1986.

With regard to the exemption requested, the Supply System considers that it does not represent an undue risk or threat to life or property in that the Appendix J test interval was based on two years of expected exposure of components to service conditions. During the period since March 1984, the time that the drywell head "O" rings have not been exposed to an operating environment (due to outages and the power ascension test program completion) has been approximately 6 months. Hence, potential degradation anticipated over the two year period would be reduced due to less exposure to operating conditions. Therefore, a test concurrent with the spring 1986 refueling outage satisfies the two year basis of Appendix J and provides the ability to test during refueling outages. The refueling outage delay, if any, dependent on spring runoff will be less than 2 months and is still in keeping with the two year intent.

The Supply System considers this exemption request to be in the public interest in that it avoids an unnecessary plant outage and subsequent loss of power generation. In addition, the exemption is desirable in order to maintain personnel exposures as low as reasonably achievable. It is evident that the exemption would achieve the purpose of the rule while compliance without an exemption would be contrary to the public interest as it would result in loss of power generation during a period of high demand (prior to the spring runoff) and a loss of resources and increased personnel exposure which could be better focused on other plant support tasks. As such, it does not endanger public life or property or the common defense and security and is otherwise in the public interest.

Based on the above and the exemption requests posted in the Federal Register (regarding TVA and CP&L), the Supply System has determined that the exemption request is authorized by law.

AMENDMENT TO TECH. SPEC. SURV. REQUIREMENT 4.6.1.2.d AND EXEMPTION TO APPENDIX J TO 10CFR50 SECTION III.D - TYPE B TEST OF DRYWELL HEAD "O" RINGS

With regard to the requested technical specification amendment, the Supply System has evaluated this request per 10 CFR 50.59 and 50.92 and has determined that no unreviewed safety questions or significant hazards will result. Further, the proposed change will not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the total operating exposure of the drywell head "O" rings will be within the two year bases intended by Appendix J. Hence, the change does not represent an increase of any magnitude in the probability or consequences of a previously evaluated accident.

2) Create the possibility of a new or different kind of accident than previously evaluated because no new designs or plant operating modes are affected by this amendment.

3) Involve a significant reduction in a margin of safety because, as discussed in 1) above, the amendment will still maintain the drywell head "O" rings within the two year bases intended by Appendix J. No margin of safety is impacted; rather, this change allows operation to continue within the original safety margins realized by Appendix J.

In guidance provided by the Staff (Federal Register Vol. 48, No. 67, April 6, 1983), examples of amendments that are not likely to involve a significant hazards consideration are listed. The request involved in this case does not match any of those examples. However, as noted above, the results of the change are clearly within all acceptable criteria.

This technical specification change and exemption request has been reviewed and approved by the WNP-2 Plant Operations Committee and the Supply System Corporate Nuclear Safety Review Board.

In accordance with 10 CFR 170.21, an application fee of One hundred fifty dollars ($150.00) accompanies this request. In accordance with 10 CFR 50.91, the State of Washington has been provided a copy of this letter. Should you require further information or assistance to aid in evaluating this request, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

GC Sorensen

G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh
Attachments

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

OPERATING LICENSE NPF-21,
REQUEST FOR AMENDMENT TO
TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENT
4.6.1.2.d, AND EXEMPTION TO
APPENDIX J TO 10CFR50 SECTION
III.D REGARDING TYPE B TEST
OF DRYWELL HEAD "O" RINGS

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 17 JAN, 1986

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 17th day of January, 1986.

Notary Public in and for the
State of Washington

Residing at Richland