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

SUBJECT: Revised application for amend to License NPF-21, modifying 860117 request re primary containment isolation valves by incorporating sys upgrading & corrections/additions concerning excess flow check valves.

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February 18, 1986
G02-86-147

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 SPECIFICATIONS (TABLE 3.6.3-1), MODIFICATION OF

Reference: Letter, G02-86-083, G.C. Sorensen (SS) to E.G. Adensam (NRC), "Request for Amendment to Technical Specifications (Table 3.6.3-1)," dated January 17, 1986.

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby requests an amendment to the WNP-2 Technical Specifications. The referenced letter, in part, requested a number of amendments to the Primary Containment Isolation Valves (Table, 3.6.3-1). This letter modifies the referenced request in order to incorporate system upgrading and incorporation of corrections/additions regarding excess flow check valves. Specifically, the following additional changes are requested:

Change No. 1 - Page 3/4 6-24

An upgrade of the H_2O_2 system as required by WNP-2 License Condition #16 is being implemented to meet Reg. Guide 1.97 requirements. The system upgrade requires the relocation of the sample return points and therefore, a redesignation of the isolation valves (from penetrations X-72b and X-73c to X-78a and X-42c). The upgraded H_2O_2 system will be fully operational when WNP-2 comes to power following the 1986 spring outage.

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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 primary containment design will not change. Only the configuration will be altered using the same valves.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated because the number of excess flow check valves is not increased. The existing valves are only being relocated to accommodate an improved system design.

3) Involve a significant reduction in the margin of safety because instrument return lines are designed to the same criteria used in the original return line designs.

Change No. 2 - Page 3/4 6-25

The referenced letter requested that excess flow check valve PI-EFC-X8, installed on the LPCS-dpI-10 line, be added to Table 3.6.3-1. Although the valve had not been specifically listed in the table, it had been included in the excess flow check valve surveillance program. This change withdraws our request to have PI-EFC-X8 added to the table and requests that excess flow check valves PI-EFC-X12A, B, and C also be deleted from Table 3.6.3-1. The design function of instrumentation RHR-dpIS-9A, B, and C and LPCS-dpI-10 have been deleted from the system. A more positive indication of RPV pressure is used, thus allowing valve actuation in accordance with ECCS response times while minimizing the potential of over pressurization of the upstream piping. Since the instruments and excess flow check valves are no longer used, it has been decided to remove them and their associated pipe/tubing from the plant. With these valves installed, testing of the excess flow check valves is required as part of the primary containment isolation valve testing requirements. To eliminate the testing of these valves, the instrument lines will be capped at the root valves and the instruments removed from the plant thereby eliminating valves PI-EFC-X12A, B, C and X8.

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 elimination of the change replaces an active component with positive design configuration. Unnecessary instrumentation will decrease the probability of an occurrence or the consequence of an accident.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated because removal of these will not affect the operation of the systems.

3) Involve a significant reduction in the margin of safety because the configuration will be typical of other plant process piping test connections.

The Supply System has reviewed these changes per 10 CFR 50.59 and determined that no unreviewed safety questions will result from implementation of the changes discussed in this amendment. This change 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 50.91, the State of Washington has been provided a copy of this letter. Should you have any questions regarding this matter, please contact Mr. P.L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

G. C. Sorensen, Manager
Regulatory Programs

SIS/slr
Attachments

cc: JO Bradfute - NRC
C Eschels - EFSEC
JB Martin - NRC RV
E Revel - BPA
NS Reynolds - BLCP&R
NRC Site Inspector

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 14 FEB, 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 14th day of February, 1986.

Notary Public in and for the
State of Washington

Residing at Kennewick