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SUBJECT: Clarifies 860328 application for amend to License NPF-21, revising License Condition 16 to delay implementation of Reg Guide 1.97 requirements until second refueling outage.

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April 11, 1986
G02-86-339

Docket No. 50-397

Director of Nuclear Reactor Regulation
Attn: 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, CLARIFICATION

Reference: Letter, G02-86-282, G. C. Sorensen (SS) to E. G. Adensam (NRC), "Request for Amendment to Operating License, License Condition 16, Attachment 2, Item 3(a)", dated March 28, 1986

The reference letter requested certain changes to the WNP-2 Technical Specifications. The following is forwarded in order to expedite Staff review of the referenced request:

Description of Amendment Request: This proposed amendment, if approved, will change a license condition of the WNP-2 Operating License NPF-21. Attachment 2, Paragraph 3.(a) of License Condition 2.C.(16), now requires that the Supply System implement (install or upgrade) requirements of Regulatory Guide 1.97, Rev. 2, with the exception of flux monitoring prior to startup following the first refueling outage. The Supply System has requested that implementation of this requirement be delayed until the second refueling outage for two specific systems: Suppression Pool Level Monitoring and Post Accident Sampling System (PASS).

The Supply System has been unable to demonstrate that the installed suppression pool level monitoring system is able to meet the accuracy requirements under post accident environment conditions as originally specified in the design specifications. This failure to demonstrate accuracy has required pursuit of alternative designs. The selection process requires extended lead time for material procurement (up to 52 weeks) which does not provide sufficient time to replace the existing system on the present schedule. The installed system will remain in service until the new system is installed.

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For the PASS system there are six (6) Process Sampling Radioactive (PSR) valves that the Supply System has analytically determined may fail when exposed to post accident environmental conditions added to service conditions resulting from heat tracing and insulating. Heat tracing and insulating these valves is accomplished in order to prevent condensation of moisture from the containment air sample and thereby providing a more representative sample. In the event the valves become inoperable, alternate methods are available to measure the extent of post accident conditions utilizing other plant instrumentation.

Basis for no significant hazards consideration determination: The Commission has provided standards for determining whether a significant hazards consideration exists (10 CFR 50.92(c)). A proposed amendment to an operating license for a facility involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated; or (2) create the possibility of a new or different kind of accident from an accident previously evaluated; or (3) involve a significant reduction in a margin of safety.

With respect to the suppression pool level monitoring system, the Supply System has determined that the requested amendment does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated because the instruments perform no automatic mitigating function. The parameter sensed, however, is relied upon to mitigate the consequences of an accident and is relied upon in the plant emergency procedures to determine actions necessary to maintain primary containment integrity. Other methods of determining suppression pool level are available and will be proceduralized prior to startup from R1; or (2) create the possibility of a new or different kind of accident from any accident previously evaluated because the alternate methods to be employed are considered sufficiently accurate and reliable to adequately direct actions necessary to respond as required by the emergency procedures; or (3) involve a significant reduction in a margin of safety because no protective functions are affected.

With respect to the PASS PSR valves, the Supply System has determined, that the proposed amendment does not: (1) involve a significant increase in the probability or consequences of an accident previously evaluated because these valves have no accident mitigation function. They provide a capability to measure the extent of an accident and that capability is still met by other plant instruments; or (2) create the possibility of a new or different kind of accident from an accident previously evaluated because no system modifications

are involved; or (3) involve a significant reduction in a margin of safety because the valves will function in their current condition as a primary containment isolation valve and otherwise provide no direct mitigating function and as discussed in (1) the capability to measure the extent of an accident is preserved.

Should you have any questions regarding this matter, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

for G. C. Sorensen, Manager
Regulatory Programs

PLP/tmh

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