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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, authorizing removal of snubbers for testing or maint during Modes 4 & 5 w/o declaring attached sys inoperable. No significant hazards exist since structural integrity met. 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

December 12, 1986
G02-86-1067

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 SPECIFICATION 3/4.7.4, SNUBBERS

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. Specifically, the Supply System is seeking to gain the ability to remove snubbers for testing or maintenance during Modes 4 and 5 without having to declare the attached system inoperable as prescribed in the Action Statement based upon previous engineering analysis performed in accordance with the requirements of 10 CFR 50.59.

During Modes 4 and 5, snubbers are required to be removed for functional testing and to eliminate interferences for performance of maintenance activities on adjacent equipment. Verbatum Technical Specification compliance would require removal to be considered an inoperable condition and entry into the Action Statement. This may also require a declaration of system inoperability each time a snubber is removed for a routine reason if the activity exceeds 72 hours. This could represent an excessive administrative burden if a pre-analyzed configuration were not allowed to be used to support the periodic functional testing requirements in the snubber LCO. During Modes 4 and 5, the loads experienced by the piping system are considerably less than those in Modes 1, 2 and 3. Thus, declaring system inoperable due to removal of snubbers which are shown to be redundant per engineering analysis is not necessary from an overall plant safety standpoint. To avoid this situation, an amendment to the Technical Specification is being requested.

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REQUEST FOR AMEND. TO TS 3/4.7.4, SNUBBERS

In support of this position, the Supply System has performed an engineering analysis in accordance with 10 CFR 50.59 which demonstrates that it is acceptable to operate with less than 100 percent of the snubbers installed in Modes 4 and 5. This analysis further demonstrates that the structural integrity of the Reactor Coolant System (RCS) and all other safety-related systems is maintained during and following a seismic or other event initiating dynamic loads since fewer snubbers are required to sustain the significantly reduced system loads encountered during plant shutdown conditions. Piping analyses have been completed to develop and support the general snubber removal criteria that are applied for maintenance and testing activities during plant Modes 4 and 5. These analyses applied all normal and accident condition load combinations occurring during plant Modes 4 and 5. The analyses were completed in full compliance with all ASME Section III code requirements and, furthermore, considered the allowable loading on containment penetrations, RPV nozzles, anchors and all remaining installed pipe supports. Piping system dynamic deflections with removed snubbers have also been evaluated for acceptability. All piping anchor groups analyzed were located inside containment with a range of pipe sizes from 2 to 26 inches in diameter. The work is documented in Supply System calculation ME-02-86-16. With this amendment, removal of snubbers during Modes 4 and 5 within the guidelines established by engineering analysis would not require entering into the Action Statement. However, if the snubber removed for testing actually fails the functional test acceptance criteria, an additional engineering evaluation is necessary and shall be performed per Specification 4.7.4g to determine the cause and subsequent testing requirements. In summary, this amendment will permit verbatum compliance with the Surveillance Requirements of LCO 3.7.4 while ensuring system operability.

The other requested change to this Technical Specification deals with the visual inspection period table (page 3/4 7-11). For the case where zero snubbers are found by inspection to be inoperable, the required inspection period is 18 months ± 25% (the provisions of 4.0.2 are not applicable). At WNP-2, this work is currently required to be performed during refueling outages. Supply System's outages are currently directed by the Bonneville Power Administration to be on an annual basis coinciding with the spring runoff or peak hydro capacity period. The table does not make any provisions for zero failures being identified for plants requiring annual refueling outages.

REQUEST FOR AMEND. TO TS 3/4.7.4, SNUBBERS

In order to correct that, we have modified the 18 month subsequent visual inspection period to account for this situation by increasing the lower tolerance to 50%, while leaving the upper tolerance at 25%. Without such a change, the Supply System could be put in the position of having to shutdown between refueling outages for the purpose of snubber surveillances, even when the last inspection revealed zero failures. We consider this to be an administrative change only.

The Supply System has reviewed this request per 10 CFR 50.59 and 50.92 and has determined that no unreviewed safety questions or significant hazards will result relative to the proposed change because it does not:

1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the temporary removal of snubbers during Modes 4 and 5 has been evaluated by engineering analysis to meet all structural integrity requirements of the original design.

2) Create the possibility of a new or different kind of accident from any accident previously evaluated because this change involves no changes to system design bases nor does it introduce any new variables than those that were previously considered. Engineering evaluation demonstrates compliance to ASME Section III requirements while the snubber is removed. The evaluation also stipulates the criteria that must be used in evaluating the number and sequence of snubbers that can be safely removed for testing and maintenance from a given piping anchor group. Hence, no new failure mode is created.

3) Involve a significant reduction in a margin of safety because even though a snubber may be temporarily removed for testing and or maintenance, the engineering analysis has demonstrated that there is sufficient design conservatism to permit this temporary situation without any reduction in system integrity. The bases of the technical specification is to rely on an engineering evaluation for system operability.

The Supply System will need this technical specification amendment to be in place during our next scheduled refueling outage, presently scheduled to begin no earlier than March 15, 1987. For this reason, we have submitted it well in advance of the outage in order to allow the Staff and the Supply System sufficient time for processing.

REQUEST FOR AMEND. TO TS 3/4.7.4, SNUBBERS

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 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.

If 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

HLA/RR/tmh
Attachment

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

STATE OF WASHINGTON)
)
County of Benton)

Subject: Tech Spec. Amend. Request
Snubbers 3/4.7.4

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.

G C 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 12th day of December, 1986.

S. B. Michaels

Notary Public in and for the
State of Washington

Residing at Richland, WA. 99352
"89"