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SUBJECT: Provides supplemental info re request for exemption & Tech Spec change re App J Type B & C leak rate testing. Info on total interval between tests re containment isolation valves discussed per telcons.

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Washington Public Power Supply System

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G02-87-47 February 11, 1987

Docket No. 50-397

U.S. Nuclear Regulatory Commission Attn: Document Control Desk Washington, D.C. 20555

Gentlemen:

Subject:

NUCLEAR PLANT NO. 2 REQUEST FOR EXEMPTION/TECHNICAL SPECIFICATION CHANGE - APPENDIX J AND SECTION 4.6.1.2.d, SUPPLEMENTAL INFORMATION

References:

 Letter, G02-86-119, G. C. Sorensen (SS) to E. G. Adensam (NRC), same subject, dated January 31, 1986
 Letter, G02-87-004, G. C. Sorensen (SS) to E. G. Adensam (NRC), same subject, dated January 9, 1987
 Letter, G02-86-338, G. C. Sorensen (SS) to E. G. Adensam (NRC), same subject, dated April 11, 1986

The reference letters requested an exemption and Technical Specification change related to Appendix J Type B and C leak rate testing and provided information as to the criteria used to identify testing schedules. In subsequent telephone conversations with the Staff, supplementary information on the total interval between tests on containment isolation valves (CIV's) and how total "leakage-to-date" would be tracked was requested.

As stated in Reference 1, the timing for WNP-2 refueling outages is dependent on annual snow melt, spring run-off and peak hydroelectric generating capacity. This date is nominally set for April 15 of each year but is subject to change in order for the plant shutdown to coincide with peak hydroelectric generating capacity in the region. For this reason, CIV's which could qualify for testing every other refueling outage (nominally 24 months) could require testing on a date when plant power is critical to the region due to a delayed spring run-off. Although the interval between testing a given valve could exceed 24 calendar months, this interval would have included the previous year's refueling

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• . Page Two February 11, 1987 APPENDIX J AND SECTION 4.6.1.2.d, SUPPLEMENTAL INFORMATION

outage (nominally 2 months) which represents a period in which the CIV was not in service. The avoidance of plant shutdown at times of high regional power demand and the refueling outage period of no service for the CIV form the basis for the exemption request for a 3 month allowance to the 24 month Type B and C testing interval. In clarification, the second sentence on page Two of the attachement to Reference 2 should read: "All Type C containment isolation valves will be tested at intervals not greater than 27 months."

Tracking of total "leakage-to-date" is administratively controlled via plant procedures which require an evaluation of individual test results to assure that the Appendix J limit of $0.6L_a$ has not been exceeded. When augmented leak tests are performed at intervals more frequent than the periodic B and C testing, as is the case for the personnel airlock and supply/exhaust purge valves, the acceptance of these tests is dependent upon a documented evaluation of a new total B and C leakage as affected by these new test results. This evaluation assures that the total Type B and C leakage-to-date as established by testing does not exceed the Appendix J limit of $0.6L_a$ during an operating period.

The Staff also requested a method by which valves tested during a specific outage would be formally identified. This identification is formalized in WNP-2 Procedure 7.4.6.1.2.4, Containment Isolation Valve and Penetration Leak Test Program, available on site for review purposes. Additionally, it should be noted that Reference 3 requested the Staff to separate the original request into two actions. The Supply System no longer considers that request valid and retracts the referenced letter.

Should you require any further information regarding this matter, please contact Mr. P. L. Powell, Manager, WNP-2 Licensing.

Very truly yours,

SC Jorensen

G. C. Sorensen, Manager Regulatory Programs

PJI/RR/tmh

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

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