



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 56 TO FACILITY OPERATING LICENSEE NO. NPF-21
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
WASHINGTON NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated February 5, 1988, the Washington Public Power Supply System (licensee) requested, on an emergency basis, an amendment to the Technical Specifications for Washington Nuclear Project No. 2 (WNP-2). Specifically, the Supply System requested that the limit for purging of the containment through the Standby Gas Treatment System be increased from 90 hours to 100 hours.

The Limiting Condition for Operation in Technical Specification 3.6.1.8 requires that purging through the Standby Gas Treatment System shall be restricted to less than or equal to 90 hours per 365 days (while in Operational Conditions 1, 2 and 3).

On February 4, 1988, a shutdown occurred providing an opportunity to identify and fix leakage within the drywell. Prior to the February 4 shutdown and leakage repair activities, 70 hours of purging had been accumulated. At that time it was felt that the 90 hours would not be exceeded. However, to allow drywell access for identification and repair of leakage, approximately 16 additional hours of purging were performed increasing the total to date to 86 hours.

Since the leakage was felt to be a steam leak a decision was made to remain in hot shutdown to provide a higher pressure to more readily identify the leakage. Additionally remaining in hot shutdown avoided an additional thermal cycle on the vessel. The decision to stay in hot shutdown resulted in accumulating more purge hours during the maintenance activities than would have been accumulated had the activities been accomplished in cold shutdown.

As a result, 86 hours have been accumulated for the current period and there is certainty that the 90 hour limit will be exceeded. Present plans include a drywell entry at higher pressures to ensure that the steam leak repair has been adequate. In order to ensure personnel safety during this follow-up entry, purging will again be required and the 90 hour limit challenged. The reinerting prior to power operation will require four hours. Furthermore, the purge system is used approximately two hours per month while the unit is at power to control containment oxygen. Additionally about 5 to 7 hours of purging will be required to bring the unit to cold shutdown if necessary again. For those reasons it was requested that the LCO be changed to allow 100 hours of purging during the current period. This request is submitted for the current period only. It is not to be permanent.

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The licensee requested that this change be made on an emergency basis, arguing that the need for additional purging could not have been foreseen and that denial of the request would result in hardship.

The licensee closely monitors the total hours purged and had recently, prior to the shutdown, made a determination that the remaining 20 hours (90-70) would be sufficient. The drywell leakage increase and prudent action to repair it during the shutdown could not be anticipated, hence the 20 hour margin is no longer sufficient. The licensee had no way of anticipating the increased drywell leakage necessitating extended drywell entries in hot shutdown hence the submittal of this request under emergency circumstances.

The licensee advised that absent this request undue hardship in plant maneuvering limits would be encountered. Greater restrictions in power operation would be imposed. Cold shutdown would be required to be entered prior to any purging activities thereby causing plant shutdown more frequently and sooner than would normally occur and increased unnecessary thermal cycles. This, the licensee contends, would constitute an effective derating over the remainder of the operating period.

Oral authorization for the requested change was given on February 5, 1988 and confirmed by letter from NRC on February 10, 1988.

2.0 EVALUATION

The basis for the inclusion of the limits on use of the purging system is to reduce the likelihood that the system would be open at the time of a LOCA since the supply and exhaust isolation valves have not been demonstrated capable of closing during a LOCA or steam line break accident. The Standard Review Plan (SRP) 6.2.4 and Branch Technical Position CSB 6-4 recognized and made allowances for the potential need for intermittent purging at facilities not having qualified valves on the purging system. Purging for 90 hours per year, which is approximately one percent of the time, while the plant is in the startup, power, hot standby, and hot shutdown modes of operation is accepted in the SRP in lieu of specified analyses to justify the containment purge system design.

The licensee's request for an amendment would allow a total of 14 hours of venting and purging for the 62 days which remained in the current time period at the time the amendment application was filed. This is equivalent to about 1% of the remaining time. Therefore, the probability of the LOCA event occurring simultaneously with venting and purging remains the same and the basis for accepting intermittent venting and purging is met.

The staff, therefore, finds there is no reduction in safety resulting from this change for the current time period and the change is acceptable.

3.0 FINAL NO SIGNIFICANT HAZARDS CONSIDERATION DETERMINATION

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

A discussion of these standards as they relate to the amendment request follows:

Standard 1 - Involve a significant increase in the probability or consequences of an accident previously evaluated.

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated. No physical changes are being made to the plant. Primary containment integrity is maintained by the operable isolation function of the valves and is not affected by this amendment. The probability of the postulated accident (a LOCA while purging through Standby Gas Treatment) occurring during the time period that these additional ten (10) hours are granted for is slightly less than the probability implicit in the current Technical Specification purging frequency rate. The specified rate is 90 hours in 365 days which equates to 15 hours for the remaining 62 days before the clock is reset on April 10, 1988. The additional 10 hours plus the remaining 4 hours would provide a total of 14 hours of venting and purging during this 62 day period. Therefore, this change does not involve a significant increase in the probability or consequences of an accident previously evaluated.

Standard 2 - Create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated because the proposed amendment does not authorize any physical changes to the facility, nor any changes to station operating procedures. No other relief from constraints on venting and purging is granted by this amendment. Therefore, this amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

Standard 3 - Involve a significant reduction in a margin of safety.

The requested amendment does not involve a significant reduction in a margin of safety because the proposed change does not affect the design basis of the plant. Adherence to the same relative rate of purging (1%) during the remainder of the current time period will maintain the margin of safety at the same level.

The staff, therefore, concludes that operation of the facility in accordance with the proposed change does not represent a significant hazards consideration.

4.0 ENVIRONMENTAL CONSIDERATION

This amendment involves a change in the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The staff has determined that this amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. As found in paragraph 3, this amendment involves no significant hazards consideration. Accordingly, this amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR Part 51.22(c)(9). Pursuant to 10 CFR Part 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of this amendment.

5.0 CONTACT WITH STATE OFFICIAL

The State of Washington's Energy Facility Site Evaluation Council advised by letter dated February 25, 1988 that they had no comment on the proposed amendment.

6.0 CONCLUSION

We have concluded, based on the considerations discussed above, that: (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations and (3) the issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: R. Samworth, NRR

Dated: May 5, 1988

UNITED STATES NUCLEAR REGULATORY COMMISSION

WASHINGTON PUBLIC POWER SUPPLY SYSTEM

DOCKET NO. 50-397

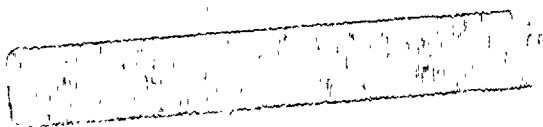
NOTICE OF CONSIDERATION OF ISSUANCE OF AMENDMENT TO
FACILITY OPERATING LICENSE AND OPPORTUNITY FOR HEARING

The U.S. Nuclear Regulatory Commission (the Commission) is considering issuance of an amendment to Facility Operating License No. NPF-21 issued to Washington Public Power Supply System (the licensee), for operation of Washington Nuclear Project 2 located in Benton County, Washington. The request for amendment was submitted by letter dated March 18, 1988 (Reference G02-88-065).

The proposed amendment would change Technical Specification Section 4.8.2.1, "D.C. Sources Surveillance Requirements." Subsection d. of that Section specifies the discharge amperage profiles which must be achievable for the D.C. batteries to be declared operable. The proposed amendment would revise those discharge amperage profiles. This change is being made because review of design documents indicated an inconsistency with the Technical Specifications. Battery load profiles were recalculated to provide the revised values.

Before issuance of the proposed license amendment, the Commission will have made findings required by the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations.

By May , 1988, the licensee may file a request for a hearing with respect to issuance of the amendment to the subject facility operating license, and any person whose interest may be affected by this proceeding and who wishes to participate as a party in the proceeding must file a written request for hearing and a petition for leave to intervene. Request for a hearing and petitions



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for leave to intervene must be filed in accordance with the Commission's "Rule of Practice for Domestic Licensing Proceedings" in 10 CFR Part 2. If a request for a hearing or petition for leave to intervene is filed by the above date, the Commission or an Atomic Safety and Licensing Board Panel will rule on the request and/or petition, and the Secretary or the designated Atomic Safety and Licensing Board will issue a notice of hearing or an appropriate order.

As required by 10 CFR 2.714, a petition for leave to intervene must set forth with particularity the interest of the petitioner in the proceeding, and how that interest may be affected by the results of the proceeding. The petition should specifically explain the reasons why intervention should be permitted with particular reference to the following factors: (1) the nature of the petitioner's right under the Act to be made a party to the proceeding; (2) the nature and extent of the petitioner's property, financial or other interest in the proceeding; and (3) the possible effect of any order which may be entered in the proceeding on the petitioner's interest. The petition should also identify the specific aspects(s) of the subject matter of the proceeding as to which petitioner wishes to intervene. Any person who has filed a petition for leave to intervene or who has been admitted as a party may amend the petition without requesting leave of the Board up to fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, but such an amended petition must satisfy the specificity requirements described above.

Not later than fifteen (15) days prior to the first prehearing conference scheduled in the proceeding, a petitioner shall file a supplement to the petition to intervene which must include a list of the contentions which are sought to be litigated in the matter, and the bases for each contention set

forth with reasonable specificity. Contentions shall be limited to matters within the scope of the amendment under consideration. A petitioner who fails to file such a supplement which satisfies these requirements with respect to at least one contention will not be permitted to participate as a party.

Those permitted to intervene become parties to the proceeding, subject to any limitations in the order granting leave to intervene, and have the opportunity to participate fully in the conduct of the hearing, including the opportunity to present evidence and cross-examine witnesses.

A request for a hearing or a petition for leave to intervene must be filed with the Secretary of the Commission, U.S. Nuclear Regulatory Commission, Washington, D.C. 20555, Attention: Docketing and Service Branch, or may be delivered to the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., by the above date. Where petitions are filed during the last ten (10) days of the notice period, it is requested that the petitioner or representative of the petitioner promptly so inform the Commission by a toll-free telephone call to Western Union at 1-(800) 325-6000 (in Missouri 1-(800) 342-6700). The Western Union operator should be given Datagram Identification Number 3737 and the following message addressed to George W. Knighton: petitioner's name and telephone number, date petition was mailed; plant name; and publication date and page number of this FEDERAL REGISTER notice. A copy of the petition should also be sent to the Office of the General Counsel - Rockville, U.S. Nuclear Regulatory Commission, Washington, D.C. 20055, and to Mr. Nicholas S. Reynolds, Esq., Bishop, Cook, Purcell and Reynolds, 1400 L Street, N.W., Washington, D.C. 20005-3502 and Mr. G. E. Doupe, Esq., Washington Public Power Supply System, P. O. Box 968, 3000 George Washington Way, Richland, Washington 99532, attorneys for the licensee.

Nontimely filings of petitions for leave to intervene, amended petitions, supplemental petitions and/or requests for hearing will not be entertained absent a determination by the Commission, the presiding officer or the presiding Atomic Safety and Licensing Board, that the petition and/or request should be granted based upon a balancing of the factors specified in 10 CFR 2.714 (a)(1)(i)-(v) and 2.714(d).

If a request for hearing is received, the Commission's staff may issue the amendment after it completes its technical review and prior to the completion of any required hearing if it publishes a further notice for public comment of its proposed finding of no significant hazards consideration in accordance with 10 CFR 50.91 and 50.92.

For further details with respect to this action, see the application for amendment which is available for public inspection at the Commission's Public Document Room, 1717 H Street, N.W., Washington, D.C., and at the Richland City Library, Swift and Northgate Streets, Richland, Washington 99352.

Dated at Rockville, Maryland, this 25th of April, 1988.

FOR THE NUCLEAR REGULATORY COMMISSION

for E. A. Knighton

George W. Knighton, Director
Project Directorate V
Division of Reactor Projects - III,
IV, V and Special Projects
Office of Nuclear Reactor Regulation

April 26, 1988

DOCKET NO. 50-397

MEMORANDUM FOR: Rules and Procedures Branch
Division of Rules and Records
Office of Administration

FROM: Office of Nuclear Reactor Regulation

SUBJECT: WASHINGTON PUBLIC POWER SUPPLY SYSTEM - WNP-2

One signed original of the *Federal Register* Notice identified below is enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (5) of the Notice are enclosed for your use.

- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s); Time for Submission of Views on Antitrust Matters.
- Notice of Consideration of Issuance of Amendment to Facility Operating License. and Opportunity for Hearing
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Order.
- Exemption.
- Notice of Granting Exemption.
- Environmental Assessment.
- Notice of Preparation of Environmental Assessment.
- Other: _____

Office of Nuclear Reactor Regulation

Note: 30-day date to be inserted in 4th paragraph.

Enclosure:
As stated

Contact: Jean Lee
Phone: X-21365

OFFICE	DRSP/PD5						
SURNAME	JL						
DATE	4/26/88						