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SUBJECT: Application for amend to License NPF-21,revising Tech Spec Table 3.3.7.1-1 re radiation monitoring instrumentation.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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October 24, 1988
G02-88-221

Docket 50-397

U. S. Nuclear Regulatory Commission
Attn: Document Control Desk
Mail Station P1-137
Washington, D. C. 20555

Gentlemen:

Subject: NUCLEAR PLANT NO. 2
OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL
SPECIFICATION TABLE 3.3.7.1-1,
RADIATION MONITORING INSTRUMENTATION

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications. Specifically, the Supply System is requesting that Section 3/4.3.7, Table 3.3.7.1-1, Radiation Monitoring Instrumentation and associated bases be modified (see Attachment 1) to reflect modifications in system configuration and operation. These modifications are necessitated by corrective actions taken to prevent an unanalyzed condition that could result from a LOCA and single failure in the main control room ventilation system.

Attachment 2 provides a schematic of the main control room ventilation system as originally designed and operated. Should a LOCA have occurred, a single failure could have resulted in both remote intakes remaining closed. For example, a "hot short" could close an intake valve in one of the remote intakes while the opposite intake was isolated as a result of the LOCA release. This event would have forced the control room ventilation system into the "recirculation" mode and caused higher control room in-leakage rates from the loss of control room pressure. This could in turn have caused excessive radiation exposure to the control room personnel. The Supply System is currently analyzing the resultant exposure levels in support of this issue. To avoid this situation, the Supply System has replaced the motor operators on intake valves 51A, 51B, 52A and 52B with manual operators. This is shown in Attachment 3. As a result of the loss of the trip function, the system is operating currently in the "pressurized" mode per the technical specification action statement. This lineup given the discussed scenario ensures exposures are maintained within the current analyzed conditions. With the actuators removed, the "trip" setpoint listed in Table 3.3.7.1-1 has only an alarm function.

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With the approval of this Technical Specification change request, operation in the pressurized mode would not be required. Normal plant lineup would be such that the two remote intakes will be administratively controlled open with normal control room intake through those intakes and the normal intake. Occasionally one remote intake might be isolated to facilitate maintenance or other activities. The 750 cfm exhaust fan would remain operational. This alignment is shown in Attachment 4. In the event of an FAZ signal, the normal intake will close, the 750 cfm exhaust de-energize, and the emergency filters automatically placed in service. These FAZ initiated actions are per the original plant design and were not altered.

After the FAZ initiation, either intake can be manually isolated locally, given a change in radiological conditions as sensed by the original radiation elements. This is similar to the original design concept that manually repositioned a remote air intake valve open following an FAZ condition and provided a single isolation given changing radiological conditions. Evaluations and actual plant walk through demonstration have verified that the manual action can be accomplished well within the time frame evaluated in Section 6.4.4 of the WNP-2 FSAR. That is, no operator manipulation of the valve within three hours of the release. Additionally, with both intakes normally open versus one as discussed in the FSAR analysis, the dose to the operators is diluted during the three hour period and consequently is bounded conservatively by the analysis provided in the FSAR. The purge valve function also functions similarly and is opened depending on the position of its associated remote intake isolation valve.

The proposed changes in the action statement (page 3/4 3-59) are for consistency with other technical specification alarm action statements wherein compensatory measures are taken (in this case manual isolation within one hour) to provide assurance that given an actual alarm condition the plant is aligned to minimize the impact of the event. For example, the 30-day action statements associated with radioactive effluent monitoring allow release to continue provided adequate sampling (a compensatory measure) is performed and action taken on out of specification samples to minimize impact. The present action statement is overly restrictive given the ability to easily impose compensatory measures.

The design safety analysis completed for changing from automatic to manual operators concluded that no new type of event important to safety is created by this change. A failure mode and effects analysis completed for the affected components confirms this conclusion. The changes ensure that the emergency filtration system remains in service and that no single component failure can prevent operator action from establishing a suitable source of air for the pressurization mode. Further, the changes retain the indication function of the remote radiation monitors.

The Supply System has reviewed this proposed change per 10CFR50.59 and concluded that in order to operate with the control room filtration system not in the pressurization mode, the attached technical specification amendment is required. The Supply System has also evaluated this request per 10CFR50.92 and provides the following in support of a finding for no significant hazards consideration. This change does not:

1) Involve a significant increase in the probability of an accident previously evaluated because the system has no accident preventive function; only accident mitigation. The consequences of an accident previously analyzed are not increased because the original FAZ isolation features are retained and analyses show adequate time exists for manual isolation of a remote intake if required. The remote air intake isolation valves normal operational position will be open and this preserves the post FAZ required position.

2) Create the possibility of a new or different kind of accident from any previously evaluated because, as discussed above, the system has only accident mitigation capability.

3) Involve a significant reduction in a margin of safety because the control room pressurization function has not been affected, nor has the time operator action to isolate an intake been exceeded.

As discussed above, the Supply System considers that this change does not involve a significant hazards consideration, nor is there a potential for significant change in the types or significant increase in the amount of any effluents that may be released offsite, nor does it involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the proposed change meets the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(9) and therefore, per 10CFR51.22(b), an environmental assessment of the change is not required.

This Technical Specification change has been reviewed and approved by the WNP-2 Plant Operations Committee (POC) and the Supply System Corporate Nuclear Safety Review Board (CNSRB).

In accordance with 10CFR170.21, an application fee of one hundred fifty dollars ($150.00) accompanies this request. In accordance with 10CFR50.91, the State of Washington has been provided a copy of this letter.

Very truly yours,

Alan Hosler for

G. C. Sorensen, Manager
Regulatory Programs

PLP:lw

Attachments

cc: C Eschels - EFSEC
JB Martin - NRC RV
NS Reynolds - BCP&R
RB Samworth - NRC
DL Williams - BPA/399
NRC Site Inspector - 901A

Request for Amend. to TS

STATE OF WASHINGTON)
) Subject: Radiation Monitoring Instrumentation
COUNTY OF BENTON)

I, A. G. HOSLER, being duly sworn, subscribe to and say that I am the Manager, WNP-2 Licensing, 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 October 24, 1988

A. G. HOSLER, Manager
WNP-2 Licensing

On this day personally appeared before me A. G. HOSLER to me known to be the individual who executed the foregoing instrument and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 24th day of October, 1988.

Notary Public in and for the
State of Washington

Residing at Kennewick, Wa