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SUBJECT: Application for amend to license NPF-21, amending Tech Specs
SR 3.8.4.6 of TS 3.8.5 "DC Sources - Operating" & to SR
3.8.5.1 of TS 3.8.5 "DC Sources - Shutdown."

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • Richland, Washington 99352-0968

July 29, 1999
GO2-99-146

Docket No. 50-397

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

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT
TECHNICAL SPECIFICATIONS SR 3.8.4.6 AND 3.8.5.1**

Reference: NRC Administrative Letter 98-10, December 29, 1998, "Disposition of Technical Specifications That Are Insufficient To Assure Plant Safety"

In accordance with the Code of Federal Regulations, Title 10, Parts 2.101, 50.59, and 50.90, the Washington Public Power Supply System hereby submits a request for amendment to the WNP-2 Operating License. Specifically, the Supply System is requesting a revision to SR 3.8.4.6 of Technical Specification 3.8.4, "DC Sources - Operating," and to SR 3.8.5.1 of Technical Specification 3.8.5 "DC Sources - Shutdown." The proposed amendment to SR 3.8.4.6 would prohibit surveillance testing of Division 1, 2, and 3 125 and 250 volt DC, battery charger capacity during Modes 1, 2, and 3. The proposed amendment to SR 3.8.5.1 would include SR 3.8.4.6 as one of the surveillance tests that are not required to be performed as part of the note to SR 3.8.5.1.

Technical Specification 3.8.4, as currently worded, would allow surveillance testing of battery charger capacity during Modes 1, 2, 3, 4, and 5. However, such surveillance testing requires the charger and related DC system to be declared inoperable. If this occurred during Mode 1, 2, or 3, the minimum functional capability of a Division 1, 2, or 3 DC electrical power system would no longer be available. Since these tests can be satisfactorily performed in Modes 4 and 5, performing the tests in Mode 1, 2, or 3 would be an unnecessary challenge to a DC power system during reactor operation. Therefore, the current wording of the Technical Specifications constitutes a degraded or nonconforming condition pursuant to the guidance of the Reference. This condition was identified recently and it was determined that administrative controls had been previously instituted to prohibit battery charger capacity surveillance testing during Modes 1, 2, and 3.

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**REQUEST FOR AMENDMENT
TECHNICAL SPECIFICATIONS SR 3.8.4.6 and 3.8.5.1**

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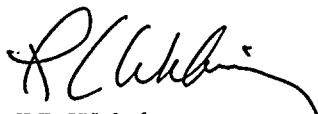
Similarly, SR 3.8.5.1 identifies several surveillance tests from Technical Specification 3.8.4 as being applicable to assure that DC electrical power subsystems are operable while Technical Specification 3.8.5 is governing. However, SR 3.8.5.1 identifies two of the enumerated surveillance tests as being not required if performance of the test would result in the inoperability of the affected DC system while it was required for service. The intent is that these SRs must still be capable of being met, but actual performance is not required. The proposed amendment to SR 3.8.5.1 would add SR 3.8.4.6 to the existing exceptions, since performing a battery charger capacity test requires declaring the affected systems inoperable.

Additional information has been attached to this letter to complete the amendment request. Attachment 1 provides a detailed description and basis for acceptability of the proposed changes. Attachment 2 describes an evaluation of the proposed changes in accordance with 10CFR50.92, and concludes the changes do not result in a significant hazards consideration. Attachment 3 provides the Environmental Assessment Applicability Review and notes that the proposed change meets the eligibility criteria for a categorical exclusion as set forth in 10CFR51.22(c)(9). Therefore, in accordance with 10CFR51.22, an environmental assessment of the change is not required. Attachment 4 summarizes the proposed change and provides a marked-up page of the Technical Specification. Attachment 5 submits the typed Technical Specification page as proposed by this request.

This request for an amendment has been approved by the WNP-2 Plant Operations Committee and reviewed by the Supply System Corporate Nuclear Safety Review Board. In accordance with 10CFR50.91, the State of Washington has been provided a copy of this letter.

Should you have any questions or desire additional information regarding this matter, please contact me or PJ Inserra at (509) 377-4147.

Respectfully,



RL Webring
Vice President, Operations Support/PIO
Mail Drop PE08

Attachments

cc: EW Merschoff - NRC RIV
JS Cushing - NRC NRR
NRC Resident Inspector - 927N

DJ Ross - EFSEC
PD Robinson -Winston & Strawn
DL Williams - BPA/1399



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STATE OF WASHINGTON)

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COUNTY OF BENTON)

Subject: Operating License NPF-21
Request for Amendment
Technical Specifications SR 3.8.4.6
and SR 3.8.5.1

I, RL Webring, being duly sworn, subscribe to and say that I am the Vice President, Operations Support/PIO, for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief that the statements made in it are true.


DATE 7/29 1999



RL Webring
Vice President, Operations Support

On this date personally appeared before me RL Webring, 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.

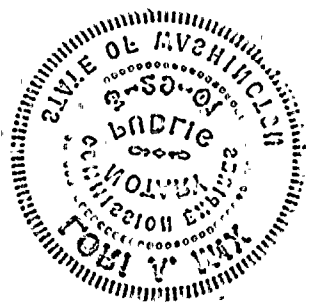
GIVEN under my hand and seal this 29 day of July 1999



Notary Public in and for the
STATE OF WASHINGTON

Residing at W. Richland

My Commission expires 3-29-01



**REQUEST FOR AMENDMENT
TECHNICAL SPECIFICATIONS SR 3.8.4.6 and 3.8.5.1
Attachment 1
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Description of Proposed Changes

Summary Of Proposed Technical Specification Request

The Washington Public Power Supply System is requesting a revision to Technical Specification 3.8.4, "DC Sources - Operating," to add a note to SR 3.8.4.6 that would prohibit performing the Division 1, 2, and 3 battery charger capacity testing during Modes 1, 2, and 3, and allow taking credit for unplanned events that satisfy the surveillance. Additionally, we are proposing to change the note included in SR 3.8.5.1 to add SR 3.8.4.6 to the surveillance tests identified as being not required if performance of the test would result in the affected DC system being declared inoperable while it is required for service. The proposed changes would bring the notes in SR 3.8.4.6 and SR 3.8.5.1 into conformance with NUREG-1434 Rev. 1.

Basis For The Proposed Technical Specification Request

During transition to the WNP-2 Improved Technical Specifications, two deviations from NUREG-1434 were adopted on the basis of a misinterpretation of a statement in Section 8.3.2 of the WNP-2 FSAR. The first deviation omitted a note from SR 3.8.4.6 that prohibited performance of surveillance testing of battery charger capacity during Modes 1, 2, and 3, and allowed taking credit for unplanned events that satisfied the surveillance. The second deviation omitted SR 3.8.4.6 from a note in SR 3.8.5.1. Since the original basis for not including the NUREG-1434 note in SR 3.8.4.6, and for omitting SR 3.8.4.6 from the note in SR 3.8.5.1 has been determined to be incorrect, we are now proposing to amend the note in SR 3.8.4.6 and in SR 3.8.5.1 at this time.

Performance of the testing prescribed by SR 3.8.4.6 requires installation of test equipment, including an electrical load bank, to increase the battery charger output current to the specified test acceptance criteria. This alteration requires the affected DC source system to be declared inoperable. Since this testing can be completed in Modes 4 and 5 without entering an action statement, it would be an unnecessary challenge to a DC power system to initiate testing during Mode 1, 2, or 3. Similarly, Technical Specification 3.8.5.1 requires the DC source subsystems to be available to support required operability of the DC distribution systems during Modes 4 and 5, and during movement of irradiated fuel assemblies in secondary containment. Since performance of the SR 3.8.4.6 battery charger capacity test results in the affected DC system being declared inoperable, the proposed change to the note in SR 3.8.5.1 would include SR 3.8.4.6 as one of the SRs not required to be performed if it resulted in the affected DC system being declared inoperable while Technical Specification 3.8.5 is governing.

Evaluation of Significant Hazards Consideration

Summary of Proposed Change

The Washington Public Power Supply System is requesting a revision to Technical Specification 3.8.4, "DC Sources - Operating," to add a note to SR 3.8.4.6 that would prohibit performing the Division 1, 2, and 3 battery charger capacity testing during Modes 1, 2, and 3, and allow taking credit for unplanned events that satisfy the surveillance. Additionally, we are proposing to change the note included in SR 3.8.5.1 to add SR 3.8.4.6 to the surveillance tests identified as being not required if performance of the test would result in the affected DC system being declared inoperable while it is required for service. The proposed changes would bring the notes in SR 3.8.4.6 and SR 3.8.5.1 consistent with NUREG-1434 Rev. 1.

No Significant Hazards Consideration Determination

The Washington Public Power Supply System has evaluated the proposed change to the Technical Specifications using the criteria established in 10 CFR 50.92(c), and has determined that it does not represent a significant hazards consideration as described below:

- **The operation of WNP-2 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.**

The proposed change has no impact on previously analyzed accidents or transients, and has no effect on operation, capacity or surveillance test details of the DC system battery chargers. The change only imposes a mode restriction on performance of specified surveillance testing and allows taking credit for unplanned events that satisfy the surveillance. Therefore, operation of WNP-2 in accordance with the proposed amendment will not involve a significant increase in the probability or consequences of an accident previously evaluated.

- **The operation of WNP-2 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident from any accident previously evaluated.**

The proposed change has no effect on operation, capacity, or surveillance test details of the DC system battery chargers. The change only prohibits performing specified battery charger capacity surveillance testing from being implemented during Mode 1, 2, or 3 and allows taking credit for unplanned events that satisfy the surveillance. The proposed change to SR 3.8.4.6 of Technical Specification 3.8.4 and SR 3.8.5.1 of Technical Specification 3.8.4 are consistent with the wording previously evaluated and approved by the NRC in NUREG-1434 Rev. 1.

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REQUEST FOR AMENDMENT
TECHNICAL SPECIFICATIONS SR 3.8.4.6 and 3.8.5.1
Attachment 2
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Therefore, operation of WNP-2 in accordance with the proposed amendment will not create the possibility of a new or different kind of accident previously evaluated.

- **The operation of WNP-2 in accordance with the proposed amendment will not involve a significant reduction in the margin of safety.**

The proposed change only imposes a mode restriction, prohibiting battery charger capacity surveillance testing from being performed during Modes 1, 2, and 3, allowing credit to be taken for unplanned events that satisfy the surveillance, and allowing such testing to be omitted under certain conditions during Modes 4 and 5 and during movement of irradiated fuel in secondary containment. Performance of this testing would remove a DC electrical power subsystem from service and could present a safety risk were an event to occur if the testing was performed in Modes 1, 2, and 3, or while DC service is required in other operating conditions. Therefore, operation of WNP-2 in accordance with the proposed amendment will not involve a significant reduction in the margin of safety.

Environmental Assessment Applicability Review

The Washington Public Power Supply System has evaluated the proposed amendment against the criteria for identification of licensing and regulatory actions requiring environmental assessment in accordance with 10CFR51.21.

The proposed change meets the criteria for categorical exclusion as provided under 10CFR51.22(c)(9) because the change does not pose a significant hazards consideration nor does it involve an increase in the amounts, or a change in the types, of any effluent that may be released offsite.

Furthermore, this request does not involve an increase in individual or cumulative occupational exposure.



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