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SUBJECT: Application for amend to License NPF-21, implementing requirements of RG 1.97, Rev 2 re wide range neutron monitor.

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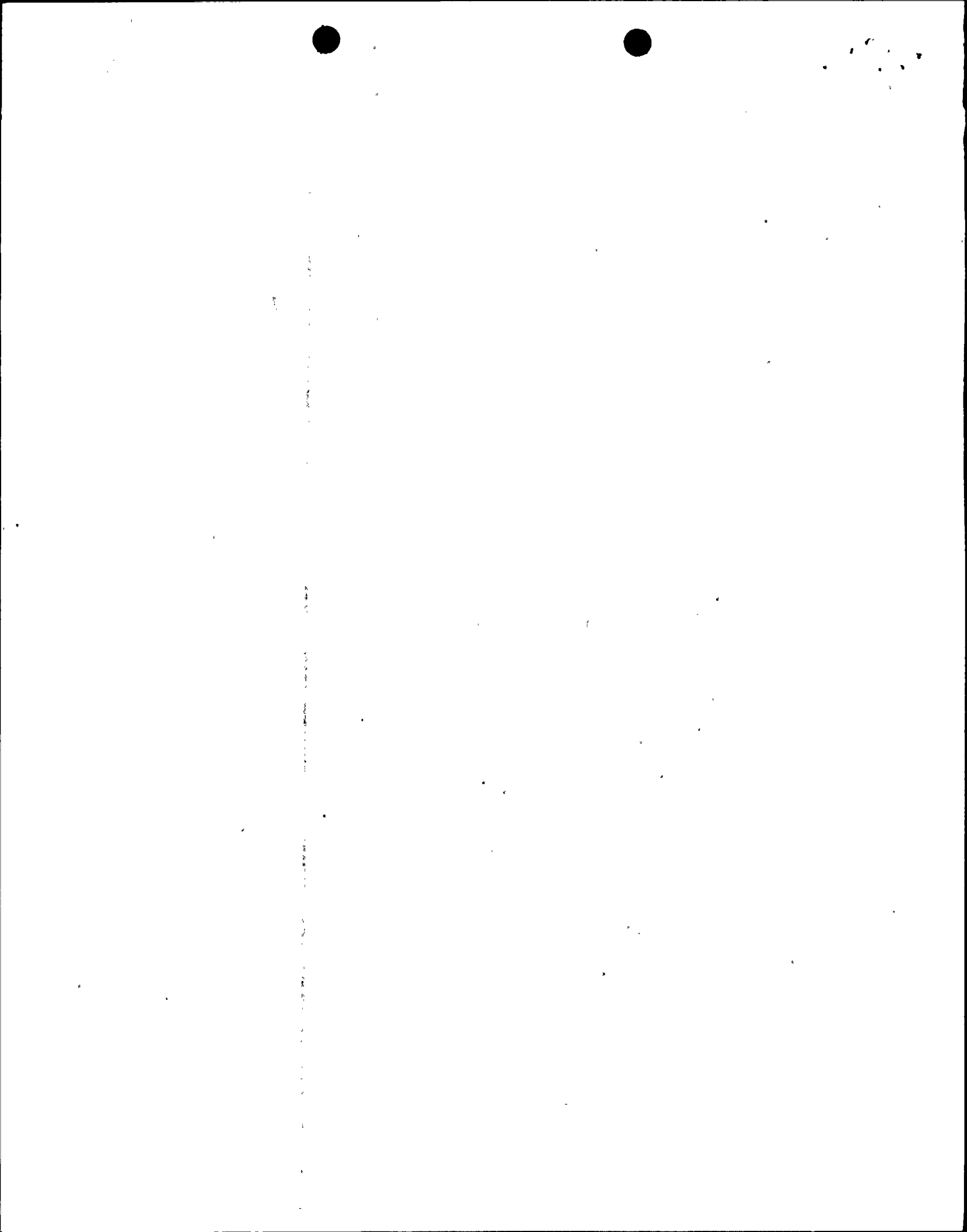
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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

P.O. Box 968 • 3000 George Washington Way • Richland, Washington 99352

March 24, 1989
G02-89-047

Docket No. 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 LICENSE CONDITION 2.C.(16),
ATTACHMENT 2, ITEM 3(b), WIDE RANGE NEUTRON MONITOR

Reference: 1) Letter, G02-87-293, GC Sorensen (SS) to NRC,
same subject, dated December 23, 1987
2) Letter, G02-89-004, GC Sorensen (SS) to NRC
"License Condition 2.C.(16), Attachment 2,
Item 3(b), Wide Range Neutron Monitor," dated 1/6/89

The subject license condition, as amended (Amendment 60), requires the Supply System to implement the requirements of Reg. Guide 1.97, Rev. 2 for flux monitoring prior to startup following the fourth refueling outage. In accordance with the Code of Federal Regulations (CFR), Title 10, Parts 50.90 and 2.101, the Supply System hereby requests that the license be amended as follows:

(b) The Licensee shall implement (installation or upgrade) requirements of R.G. 1.97, Rev. 2 for flux monitoring prior to startup following the fifth refueling outage.

The Wide Range Neutron Monitor (WRNM) designed and fabricated by Gamma-Metrics (G-M) was installed and tested during the second refueling outage (Spring 1987). From a performance standpoint, the equipment continues to operate satisfactorily. Although the scope of the outstanding discrepancies has been greatly reduced, the problem continues to be the ability to demonstrate that the entire WRNM system is environmentally and seismically qualified in accordance with Reg. Guide 1.97, Rev. 2.

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Page Two

REQUEST FOR AMENDMENT TO LICENSE CONDITION 2.C.(16), ATTACHMENT 2,
ITEM 3(b), WIDE RANGE NEUTRON MONITOR

The Supply System has and will continue to put forth our best efforts to successfully complete the qualification process during the upcoming refueling outage (beginning approximately April 15, 1989). However, there are two outstanding actions remaining to be completed; namely resolution of the amplifier qualification and the acceptance testing that is to take place during the upcoming outage. The failure of either of these actions could cause a delay in completing the qualification effort in the time frame presently required.

The Supply System continues to take actions in a good faith effort to stay on a success path. With respect to qualification of the amplifier, since the last quarterly report (Reference 2) we have taken a number of steps:

- o An outside contractor has been hired to review the seismic report. This will allow the seismic analysis to be addressed at the same time the amplifier and in-containment LOCA tests are reviewed.
- o The Supply System has directed Gamma-Metrics to utilize Wyle Labs to expedite resolution of the analysis of the amplifier qualified life.
- o Additional funding has been authorized in an effort to accelerate amplifier qualification testing.
- o Numerous meetings and telephone conversations have been held between the Supply System, G-M and Wyle to keep this task at a high level of visibility.

With respect to the upcoming testing during the outage:

- o The necessary in-house procedures have been prepared and are currently being reviewed by the appropriate organizations.
- o Gamma-Metrics has been scheduled to perform testing and any necessary repairs on in-containment equipment during the outage.
- o The testing has been scheduled early in the outage in order to maximize the time available for repairs.
- o The Supply System continues to monitor other utilities efforts regarding this issue through the BWROG, and our actions are being planned accordingly.

REQUEST FOR AMENDMENT TO LICENSE CONDITION 2.C.(16), ATTACHMENT 2,
ITEM 3(b), WIDE RANGE NEUTRON MONITOR

While the Supply System believes we have made all possible efforts to comply with our present license condition, there is no way to predict with certainty what will happen during the next few months. For this reason, we are in parallel submitting this request for an amendment to our license. On the basis of our operating experience to date, as well as the 50.92 evaluation below, the Supply System believes that the existing neutron flux monitoring system is acceptable for interim use.

The Supply System has reviewed the requested amendment per 10CFR 50.59 and 50.92 and has determined that no unreviewed safety questions or significant hazards will result. Further, the proposed change will not:

- 1) Involve a significant increase in the probability or consequences of an accident previously evaluated because the existing instrumentation consists of four redundant safety-related channels. Additionally, there are unrelated systems in place to provide operators with sufficient data to assess reactor conditions (e.g., control rod position monitors, reactor vessel level and pressure monitors) in the unlikely event of an accident condition prior to replacement.
- 2) Create the possibility of a new or different kind of accident because no function of the flux monitor system is being changed; therefore, no new or different kind of accident is conceivable.
- 3) Involve a significant reduction in a safety margin as adequate instrumentation is provided to allow the operator to assess reactor conditions without this monitor in the unlikely event of an accident condition that could cause the monitor currently in place to fail prior to replacement.

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 10CFR 51.22(c)(9) and therefore, per 10CFR 51.22(b), an environmental assessment of the change is not required.

Page Four

REQUEST FOR AMENDMENT TO LICENSE CONDITION 2.C.(16), ATTACHMENT 2
ITEM 3(b), WIDE RANGE NEUTRON MONITOR

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 10CFR 50.91, the State of Washington has been provided a copy of this letter.

This letter is also intended to fulfill the obligation to provide a quarterly report by April 7, 1989 (Reference 1). The next required quarterly report will be submitted by July 7, 1989

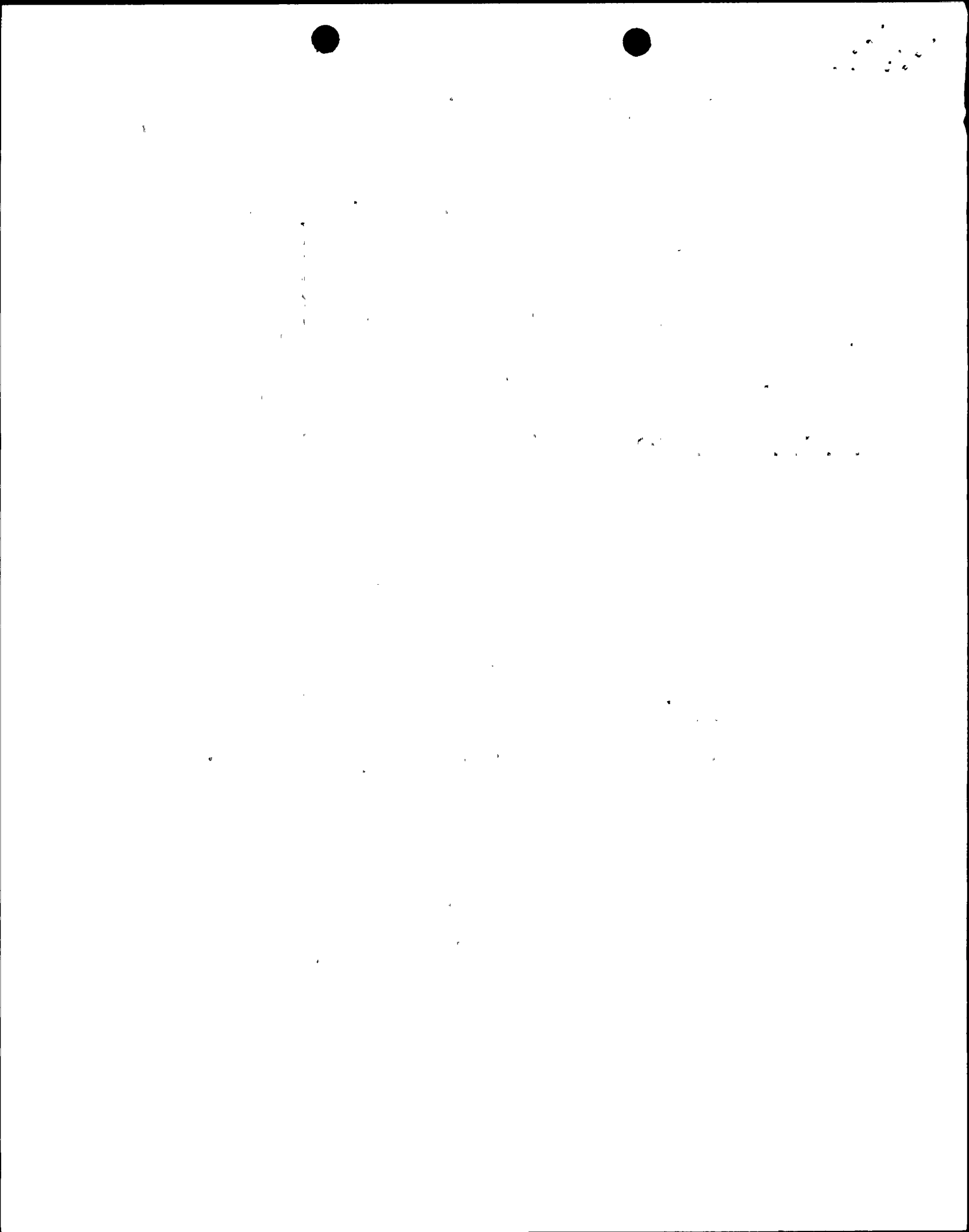
Very truly yours,



G. C. Sorensen, Manager,
Regulatory Programs

HLA/bk
Attachments

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



STATE OF WASHINGTON)
)
COUNTY OF BENTON)

Subject: Amend. Request
2.C.(16). Att. 2
Item 3(b)

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.

DATE 23 MAR, 1989

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 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 23rd day of March 1989.

Phyllis Z. Robertson
Notary Public in and for the STATE
OF WASHINGTON

Residing at Bickland, WA
My commission expires 7/14/91



