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SUBJECT: Application for amend to License NPF-21, revising battery load profiles in SR 4.8.2.1.d.2.

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1. The first step in the process is to identify the problem or issue that needs to be addressed. This involves gathering information and understanding the context of the problem.

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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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

March 2, 1990
G02-90-036

Docket No. 50-397

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

Gentlemen:

Subject: NUCLEAR PLANT NO. 2, OPERATING LICENSE NPF-21
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATION
3.8.2.1 DC SOURCES, BATTERY LOAD PROFILE

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 the battery load profiles in Surveillance Requirement 4.8.2.1.d.2 be revised as attached to reflect the results of recent reviews of battery capabilities. In summary the reviews were due to 1) an increase in load to battery B1-1 due to a change in the motor operator for RHR-V-40 2) an increase in the initial current to both battery B1-1 and B1-2 due to a correction of a previously unidentified error, and 3) a review of the listed batteries capacity to identify margin and change the load profiles accordingly. The third review was done so that should a new load be identified, use of the margin will avoid the necessity of submitting a technical specification change request. The present table would not allow this. Any new load additions presently require a technical specification change prior to implementation.

The recent review of motor operated valves was done as part of the review for Generic Letter 89-10, "Safety Related Motor-Operated Valve Testing and Surveillance". This review identified the motor on RHR-V-40 as being undersized. Accordingly the motor will be replaced with one capable of meeting the criteria of Generic Letter 89-10. However, because of an impact on the battery load profile for 125 VDC battery B1-1 replacement must be deferred until approval of the attached technical specification change.

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In the interim RHR-V-40 has been tagged closed and verified closed by manual handwheel operation. RHR-V-40 is one of two motor operated valves in the discharge of the RHR system to Radwaste. It is normally in the closed position and in the event of an accident receives a closed signal. Operation of the valve to open is not relied on to mitigate the consequences of, or prevent an accident. RHR-V-40 is the normal letdown path for suppression pool level control and, as stated above, receives a closed signal as an active safety function. Should it be necessary to operate the valve in the interim period, an operator will be sent to the valve to manually operate it. He will also verify the valve closed in the event of an isolation signal or at the end of the operation requiring the valve to be opened. This is the same mode of operation permitted by Technical Specification 3.6.3 Action a. in which Primary Containment Isolation Valves which are isolated due to inoperability can be reopened on an intermittent basis under administrative control.

The impact of the change in motor size to the technical specifications is in the battery load profile for 125V DC battery B1-1. The motor operator for RHR-V-40 is powered from this source and the increased size requires a larger motor current. The change to both 125V DC batteries is the result of correcting an error identified by the Supply System's Safety System Functional Inspection of the 125V DC batteries. The previous calculations did not consider that when the 480 volt unit substation breakers are tripped the charging motor automatically runs after the trip. This is opposite to the 4160/6900 volt breaker in which the charging motor is run when the breaker is closed. Therefore the 480 volt breaker motor loads had to be corrected in the initial load profile. This amounted to an additional in-rush load of 50 amps on B1-1 and 60 amps on B1-2. Battery load calculations have been performed reconfirming that the batteries can accommodate these increases and meet the operability requirements of the Surveillance Requirements in Section 4.8.2.1 of the WNP-2 Technical Specifications. However, the battery load profile specified in surveillance 4.8.2.1.d.2 must be changed, so that the surveillance will continue to verify operability of the battery for the larger load profile.

The Supply System has reviewed the revision per 10CFR 50.92 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 or consequences of an accident previously evaluated because calculations have been performed demonstrating that the battery can accommodate the increased load and meet all requirements for operability. Hence the operation of the battery under normal and upset conditions is not degraded and this change does not impact the probability or consequences of an accident previously evaluated.



REQUEST FOR AMEND TO TS 3.8.2.1 DC SOURCES, BATTERY LOAD PROFILE

- 2) Create the possibility of a new or different kind of accident from any previously evaluated because the battery is not being changed, nor are any changes being made to the way it is being utilized or asked to perform. The additional load being added has been evaluated, by calculation, as not resulting in any changes to the battery capability and confirmed the battery as still capable of fulfilling the licensing bases requirements. Hence no new or different kind of accident is credible due to this change.
- 3) Involve a significant reduction in a margin of safety because as discussed above calculations have been performed to confirm that the battery will remain operable and meet the Surveillance Requirements of Technical Specification 4.8.2.1. Hence the battery will continue to fulfill its safety requirements. The impact of an increased load profile is to potentially shorten the life of the battery and dictate battery replacement. However in meeting the requirements of the Technical Specification Surveillance Requirements in Section 4.8.2.1 the required margin of safety is assured.

As discussed above, the Supply System considers that this change does not involve a significant hazards consideration. Further, the change has no 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.

Please note that battery load profile testing will be conducted during the Spring 1990 outage. Accordingly, this change will be needed to support the outage tentatively scheduled to start April 15, 1990.

This amendment request has been reviewed and approved by the WNP-2 Plant Operating 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.

Very truly yours,


G. C. Sorensen, Manager
Regulatory Programs

PLP/bk

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

STATE OF WASHINGTON)
COUNTY OF BENTON)

Subject: Request for Amendment to
T. S. 3.8.2.1, DC Sources,
Battery Load Profile

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 2 MARCH, 1990

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 2nd day of March 1990.

Reva B. Robinson
Notary Public in and for the
STATE OF WASHINGTON

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

