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

January 17, 1992

Docket No. 50-397

Mr. G. C. Sorensen, Manager
Regulatory Programs
Washington Public Power Supply System
3000 George Washington Way
P. O. Box 968
Richland, Washington 99352

Dear Mr. Sorensen:

SUBJECT: OFFICE OF NUCLEAR REACTOR REGULATION TEMPORARY WAIVER OF COMPLIANCE TO WNP-2 TECHNICAL SPECIFICATION SURVEILLANCE REQUIREMENT 4.6.1.4

This letter authorizes a temporary waiver of compliance for Facility Operating License No. NPF-21 from the requirements of WNP-2 Technical Specification (TS) Surveillance Requirement (SR) 4.6.1.4 in regard to the Main Steam Isolation Valve Leakage Control System (MSIV LCS). The temporary waiver of compliance was granted verbally on January 16, 1992, by NRC's Office of Nuclear Reactor Regulation (NRR), with concurrence of NRC's Region V office. Your letter to the NRC Document Control Desk dated January 16, 1992, provided the written basis for the temporary waiver of compliance that you requested.

The waiver became effective on January 16, 1992. An emergency TS amendment request addressing modification of the SR acceptance criterion will be submitted by January 21, 1992. This waiver is effective until March 16, 1992, by which time it is expected that the proposed TS amendment is granted or denied by NRR.

NRR performed an evaluation of your written documentation and found that it provided an acceptable basis for granting the temporary waiver of compliance. Specifically, SR 4.6.1.4.c requires that at least once per 18 months each MSIV LCS subsystem shall be demonstrated operable by verifying that the LCS blower develops a required vacuum at a rated capacity. For the inboard valves, it is 17" H_2O at 30 scfm; for the outboard valves, it is 17" H_2O at 30 scfm. Contrary to this requirement, the SR was performed with an acceptance criterion of 30 cfm.

The purpose of the MSIV LCS is to reduce the direct, untreated leakage of fission products through closed isolation valves in the Main Steam System following a loss of coolant accident with subsequent core damage. The design requirement of the MSIV LCS blowers is that it accommodate a leakage rate of five times the TS leakage of 11.5 scfh per valve or 230 scfh (3.8 scfm). By letter dated January 16, 1992, you stated that this value, when corrected for worst case temperature, pressure and humidity, would never exceed an indicated value of 5 cfm. On this basis you conclude that your previously used

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surveillance requirement acceptance criterion of 30 cfm is sufficiently conservative. You state that a review of engineering documentation has revealed that the correct units are cfm, and not scfm as currently stated in the TS. Finally, you state that this waiver does not involve a significant hazards consideration, does not have irreversible environmental consequences, or safety significance, and thus no compensatory actions are warranted.

The NRC staff agrees with the assessment provided in your January 16, 1992, letter and, therefore, grants the temporary waiver of compliance. However, the staff does not believe that this discrepancy in the flow units could not have been avoided. All licensees are responsible for ensuring the accuracy of plant-specific documentation for their facilities. This oversight is indicative of improper control of design specifications and this situation should be corrected.

Sincerely,

Martin J. Virgilio, Assistant Director
for Regions IV and V
Division of Reactor Projects, III/IV/V
Office of Nuclear Reactor Regulation

cc:
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Sincerely,

Suzanne Black/for

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