

November 17, 1993

Docket No. 50-397

Mr. J. V. Parrish (Mail Drop 1023)
Assistant Managing Director, Operations
Washington Public Power Supply System
P.O. Box 968
Richland, Washington 99352-0968

Dear Mr. Parrish:

SUBJECT: REQUEST FOR ADDITIONAL INFORMATION WITH REGARD TO PROPOSED AMENDMENT TO TECHNICAL SPECIFICATION (TS) 3.1.3.1 - CONTROL RODS, FOR WASHINGTON NUCLEAR PLANT, UNIT NO. 2 (TAC NO. M77947)

By letter dated October 23, 1990, Washington Public Power Supply System requested an amendment to TS, 3.1.3.1 - Control Rods. The proposed amendment requests that actions for inoperable scram discharge volume vent and drain valves be provided as a Limiting Condition for Operation. After review of the submittal, the staff determined the need for additional information. Enclosed is a request for additional information (RAI) that is needed to complete our review of your submittal. We request that you respond to the RAI within 60 days of your receipt of this letter.

This request for information affects fewer than 10 respondents. Therefore, it is not subject to Office of Management and Budget review under Pub. L. 96-511.

Please contact us should you have any questions regarding this request.

Sincerely,

James W. Clifford, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
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UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

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Please contact us should you have any questions regarding this request.

Sincerely,

A handwritten signature in cursive script that reads "Theodore R. Quay for".

James W. Clifford, Senior Project Manager
Project Directorate V
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosure:
As stated

cc w/enclosure:
See next page

Mr. J. V. Parrish
Washington Public Power Supply System

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(WNP-2)

cc:

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REQUEST FOR ADDITIONAL INFORMATION

INOPERABLE SCRAM DISCHARGE VOLUME (SDV) VENT AND DRAIN VALVES

WASHINGTON NUCLEAR POWER PLANT, UNIT 2

The following questions relate to the request by Washington Public Power Supply System (Supply System) to amend Technical Specification (TS), 3.1.3.1 - Control Rods. The proposed amendment requests that actions for inoperable SDV vent and drain valves be provided as a Limiting Condition for Operation (LCO) for Washington Nuclear Plant, Unit 2.

1.0 Regarding the bases for the 7-day requirement to restore the valve(s) to operable status;

1.1 The Supply System states the function of these valves is a containing function and specifications should apply actions no more severe than the primary containment isolation valves (LCO 3.6.3). Furthermore, the licensee states the actions provided are considered consistent with required actions for the primary containment isolation valves, but the proposed request provides 7 days as compared to 4 hours to restore the inoperable valve stated in LCO 3.6.3. What is the justification that the Supply System used for the 7 days to be considered consistent with the required actions for the primary containment isolation valves?

1.2 The Supply System specifies that the amendment is similar in practice to TS at Grand Gulf, Perry, Clinton, River Bend and Susquehanna; however, in review of TS of those respective plants, the completion time is 24 hours to restore the SDV vent and/or drain valves to operability. What is the justification that the Supply System used for the 7 days completion time being similar in practice to the TS of the plants listed above?

2.0 Regarding 10 CFR 50.92;

2.1 The Supply System needs to demonstrate that the amendment does not represent a significant hazard because it does not involve a significant increase in the probability or consequences of an accident previously evaluated. The submittal specifies a 7-day period to restore the inoperable valves that "will not allow continuous operation and thereby adequately limits the probability of a single failure to create an unisolated path for reactor coolant release." What is the criteria used to determine the "adequacy" of the 7-day period of continued operation to limit the probability of a single failure to create an unisolated path for a release?

2.2 How was it determined that the increased time of exposing the plant to a single failure of the SDV vent and drain valves is an insignificant reduction in a margin of safety?

3.0 Regarding background of scram discharge valves;

3.1 What is the normal leakage for a 7-day period?

3.2 What is the risk with respect to radiological exposure and primary containment isolation should a redundant valve fail in a single line?

3.3 What would be the radiation release due to a scram?

REQUEST FOR ADDITIONAL INFORMATION
WNP-2 POWER UPRATE

The Supply System submittal does not discuss the instrument setpoint methodology, and the staff has been unable to determine whether the GE setpoint methodology discussed in GE Topical Report NEDO-31336 is used, or a plant-specific setpoint methodology has been used for this application.

If a plant-specific setpoint methodology is used, then provide the following information:

- a. A description of the setpoint methodology used and how it differs from NEDO-31336.
- b. Include reference to the setpoint methodology in the report.
- c. Calculations and related documents that were utilized to derive the new trip setpoint and allowable values for the following parameters:
 - 1) Reactor vessel steam dome pressure, high
 - 2) Flow biased simulated thermal power, high
 - 3) Main steam line flow, high

If the GE NEDO-31336 setpoint methodology is used, then provide the following information:

- a. Include reference to the GE report in your submittal.
- b. The staff's Safety Evaluation Report (SER) on GE Topical Report NEDO-31336, identified plant-specific information that was needed to justify the application of the GE report. Provide the necessary information, identified in the staff SER, to justify the applicability of the GE report to WNP-2.
- c. Calculations and related documents that were utilized to derive the new trip setpoint and allowable values for the following parameters:
 - 1) Reactor vessel steam dome pressure, high
 - 2) Flow biased simulated thermal power, high
 - 3) Main steam line flow, high

Alternatively, if the GE methodology is used, you can confirm that the calculations for these setpoints are identical to another plant that has been previously reviewed and approved by staff. As another alternative, if your calculations are not identical to another plant, you can provide a comparison to another plant's calculations and justify the differences.