



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION  
RELATED TO AMENDMENT NO. 131 TO FACILITY OPERATING LICENSE NO. NPF-21  
WASHINGTON PUBLIC POWER SUPPLY SYSTEM  
NUCLEAR PROJECT NO. 2  
DOCKET NO. 50-397

1.0 INTRODUCTION

By letter dated January 6, 1994, Washington Public Power Supply System submitted a request for changes to the Technical Specifications (TS) for Washington Nuclear Project No. 2 (WNP-2). The proposed changes would delete the requirements related to seismic monitoring instrumentation from the TS and relocate them to the Final Safety Analysis Report (FSAR) and plant procedures. The requirements of these TS, however, will still be maintained and controlled pursuant to the requirements of TS 6.8.1, "Procedures and Programs," and 10 CFR 50.59, "Changes, tests, and experiments."

2.0 EVALUATION

Section 50.36 of Title 10 of the *Code of Federal Regulations* established the regulatory requirements related to the content of TS. The rule requires that TS include items in specific categories, including safety limits, limiting conditions for operation, and surveillance requirements; however, the rule does not specify the particular requirements to be included in a plant's TS. The NRC developed criteria, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39132), to determine which of the design conditions and associated surveillances need to be located in the TS "to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety." Briefly, those criteria are (1) detection of abnormal degradation of the reactor coolant pressure boundary, (2) boundary conditions for design-basis accidents and transients, (3) primary success paths to prevent or mitigate design-basis accidents and transients, and (4) functions determined to be important to risk or operating experience. The Commission's final policy statement acknowledged that its implementation may result in the relocation of existing technical specification requirements to licensee controlled documents and programs.

Appendix A to 10 CFR Part 100 requires that seismic monitoring instrumentation be provided to promptly determine the magnitude of a seismic event and evaluate the response of those features important to safety. This capability is required to allow for a comparison of the measured response to that used in



the design basis for the unit. Comparison of such data is needed to (1) determine whether the plant can continue to be operated safely and (2) permit such timely action as may be appropriate. However, these components are not factored into accident analyses at WNP-2 nor do they affect the margin of safety of the plant. Seismic instrumentation does not actuate any protective equipment or play any direct role in the mitigation of an accident. The capability of the plant to withstand a seismic event or other design-basis accident is determined by the initial design and construction of systems, structures, and components. The instrumentation is used to alert operators to the seismic event and evaluate the plant response. Therefore, requirements related to the seismic monitoring instrumentation do not satisfy any of the above final policy statement criteria and need not be included in the TS. In addition, the proposed amendment does not involve a change in the manner in which the plant will be operated, maintained, or tested. The requirements described in the affected TS will be maintained, and any subsequent changes to the plant procedures or the FSAR related to these instruments will be made in accordance with TS 6.8.1 and 10 CFR 50.59.

On this basis, the staff concludes that TS LCO 3.3.7.2, Surveillance Requirements (SRs) 4.3.7.2.1 and 4.3.7.2.2, Tables 3.3.7.2-1 and 4.3.7.2-1, and the Bases for TS 3/4.3.7.2, which are related to seismic monitoring instrumentation, do not need to be controlled by TS; changes to these requirements are adequately controlled by 10 CFR 50.59 and TS 6.8.1. Should the licensee's determination conclude that an unreviewed safety question is involved, due to either (1) an increase in the probability or consequences of accidents or malfunctions of equipment important to safety, (2) the creation of a possibility for an accident or malfunction of a different type than any evaluated previously, or (3) a reduction in the margin of safety, as defined in the basis for any TS, NRC approval and a license amendment would be required prior to implementation of the change. NRC inspection and enforcement programs also enable the staff to monitor facility changes and licensee adherence to updated final safety analysis report commitments and to take any remedial action that may be appropriate.

The staff has concluded, therefore, that relocation of the requirements related to seismic monitoring instrumentation (TS LCO 3.3.7.2, SRs 4.3.7.2.1 and 4.3.7.2.2, Tables 3.3.7.2-1 and 4.3.7.2-1, and the Bases for TS 3/4.3.7.2) is acceptable because (1) their inclusion in technical specifications is not specifically required by 10 CFR 50.36 or other regulations, (2) these requirements are not required to avert an immediate threat to the public health and safety, and (3) changes that are deemed to involve an unreviewed safety question will require prior NRC approval in accordance with 10 CFR 50.59(c).

### 3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Washington State official was notified of the proposed issuance of the amendment. The State official had no comments.



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#### 4.0 ENVIRONMENTAL CONSIDERATION

The amendment changes a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 and changes surveillance requirements. The NRC staff has determined that the amendment involves no significant increase in the amounts, and no significant change in the types, of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that the amendment involves no significant hazards consideration, and there has been no public comment on such finding (59 FR 14902). Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

#### 5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: M. Shuaibi

Date: August 22, 1994



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