



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 139 TO FACILITY OPERATING LICENSE NO. NPF-21
WASHINGTON PUBLIC POWER SUPPLY SYSTEM
NUCLEAR PROJECT NO. 2
DOCKET NO. 50-397

1.0 INTRODUCTION

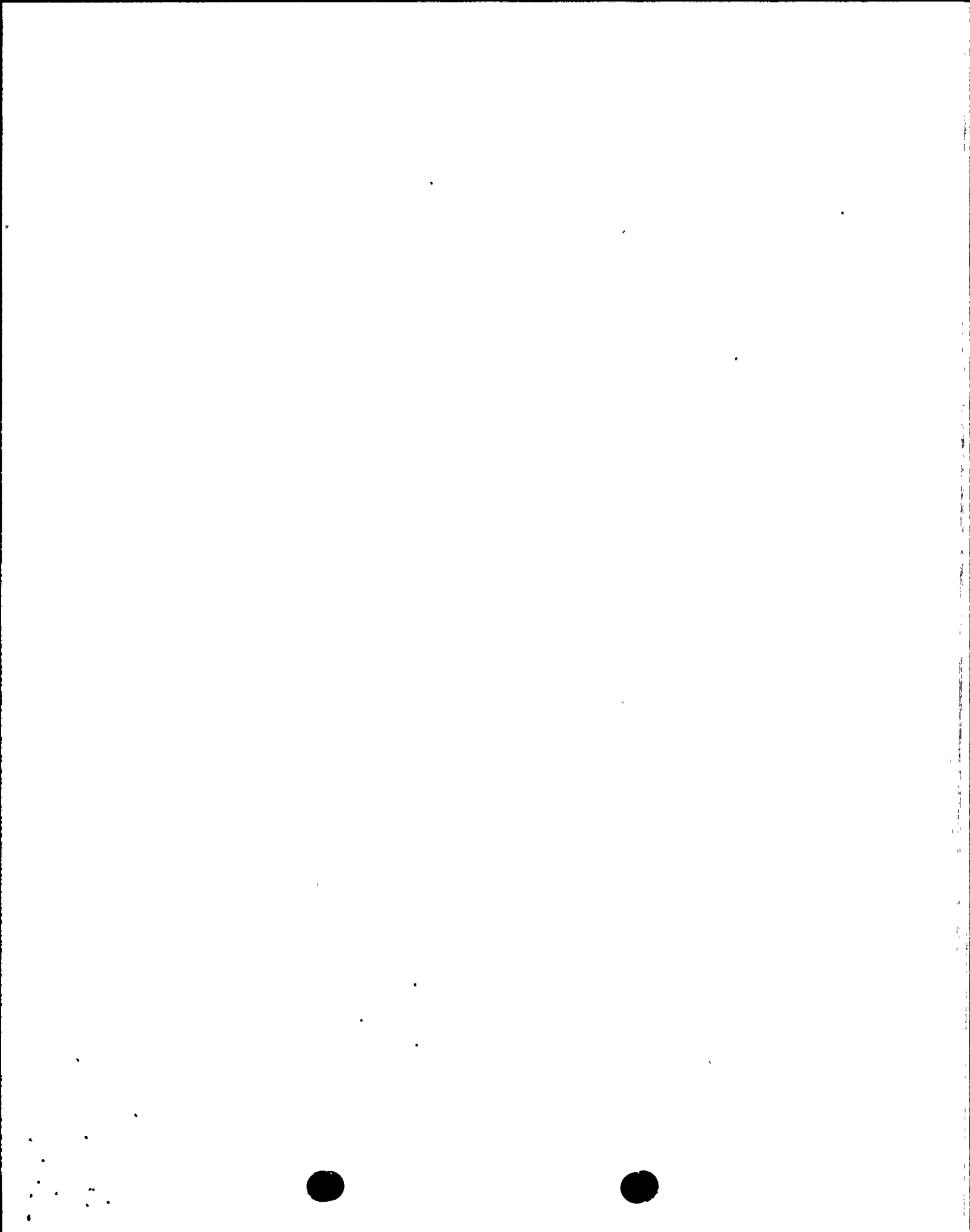
By letter dated July 12, 1994, the Washington Public Power Supply System (WPPSS or the licensee) proposed that Appendix A of Facility Operating License NPF-21 be amended to revise the WPPSS Nuclear Project No. 2 Technical Specifications (TS). The changes modify the action statements of TS 3.3.1, 3.3.2, and 3.3.3 to allow relocation of Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3 from the TS to the Final Safety Analysis Report (FSAR). Additional changes to TS surveillance requirements 4.3.1.3 and 4.3.2.3 incorporate existing exclusions for neutron monitors and radiation detectors from response time testing requirements. The TS changes and relocated tables are associated with reactor protection system (RPS), isolation actuation system (IAS), and emergency core cooling system (ECCS) instrumentation.

The NRC provided guidance to all holders of operating licenses or construction permits for nuclear power reactors on these TS changes in Generic Letter (GL) 93-08, "Relocation of Technical Specification Tables of Instrument Response Time Limits," dated December 29, 1993.

2.0 BACKGROUND

In the early 1980s, the NRC staff undertook efforts to address problems related to the content of nuclear power plant TS. These projects have resulted in the issuance of various reports, proposed rulemakings, and Commission policy statements. Line item improvements became a mechanism for TS improvement as part of the implementation of the Commission's interim policy statement on TS improvements published on February 6, 1987 (52 FR 3788). The final Commission policy statement on TS improvements was published July 22, 1993 (58 FR 39132). The final policy statement provided criteria that the industry can use to more clearly establish the framework for TS. The NRC staff has maintained the line item improvement process, through the issuance of generic letters, to improve the content and consistency of TS and to reduce the licensee and staff resources required to process amendments related to the TS being relocated from the TS to other licensee documents as a result of the implementation of the Commission's final policy statement.

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Section 50.36 of Title 10 of the Code of Federal Regulations establishes the regulatory requirements for licensees to include TS as part of the application for an operating license. The rule requires that TS include items in five specific categories: (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operations; (3) surveillance requirements; (4) design features; and (5) administrative controls. In addition, the Commission's final policy statement on TS improvements and other Commission documents provide guidance regarding the required content of TS. The fundamental purpose of the TS, as described in the Commission's final policy statement, is to impose those conditions or limitations upon reactor operation necessary to obviate the possibility of an abnormal situation or event giving rise to an immediate threat to the public health and safety and to establish certain conditions of operation that cannot be changed without prior Commission approval.

The Commission's final policy statement recognized, as had previous statements related to the NRC staff's TS improvement program, that implementation of the policy would result in the relocation of existing TS requirements to licensee-controlled documents such as the FSAR. Those items relocated to the FSAR would in turn be controlled in accordance with the requirements of 10 CFR 50.59, "Changes, tests, and experiments." Section 50.59 provides criteria to determine when changes to a facility, procedures, or tests and experiments planned by a licensee require prior Commission approval in the form of a license amendment in order to address any unreviewed safety questions or changes to the TS. NRC inspection and enforcement programs also enable the NRC staff to monitor facility changes and licensee adherence to FSAR commitments and to take appropriate remedial action.

3.0 EVALUATION

The licensee proposed changes to TS 3.3.1, TS 3.3.2, and TS 3.3.3 that remove references to Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3. The change also removes the listed tables from the TS. The licensee also proposed to incorporate existing exclusions for response time testing of neutron detectors and radiation monitors, identified in TS Surveillance Requirements 4.3.1.3 and 4.3.2.3, into the revised TS. In its July 12, 1994, amendment request, in accordance with the schedule requirements of 10 CFR 50.71, the licensee committed to include the relocated instrument response time limits in the next FSAR update after their request is approved.

Tables 3.3.1-2, 3.3.2-3, and 3.3.3-3 contain the required values for the response time limits for the RPS, IAS, and ECCS instruments. The limiting conditions for operation (LCOs) for the RPS, IAS, and ECCS instrumentation specify that these systems must be operable with the response times as specified in these tables. Action statements for systems that do not meet the operability requirements are contained in TS 3.3.1, TS 3.3.2, and TS 3.3.3. The response time limits are also the acceptance criteria for the response time tests performed to satisfy the surveillance requirements of TS 4.3.1.3, TS 4.3.2.3, and TS 4.3.3.3 for each applicable RPS, IAS, and ECCS trip function. The surveillance requirements ensure that the response times of the RPS, IAS, and ECCS instruments are consistent with the assumptions of the



safety analyses performed for design basis accidents and transients. The changes associated with the implementation of GL 93-08 involve only the relocation of the RPS, IAS, and ECCS response time limit tables to the FSAR. The changes do not affect the TS action statements for inoperable instrumentation, nor do they affect the surveillance requirements to perform response time testing. The FSAR will contain the acceptance criteria for the required RPS, IAS, and ECCS response time surveillances.

The NRC staff considers that the removal of the specific response time tables does not eliminate the requirements for the licensee to ensure that the protection instrumentation is capable of performing its intended safety functions. Relocation of the the specific values of the required response times does not change the licensee's responsibility to evaluate any changes to response time requirements in accordance with the requirements of 10 CFR 50.59. If the licensee wanted to change any of the response times in the relocated table, the licensee would have to determine whether the change involved an unreviewed safety question. If the licensee determined that any such proposed change involved 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 a margin of safety, the licensee would have to obtain prior NRC approval of a license amendment before implementing the proposed change.

The NRC also determined that 10 CFR 50.36 does not require that the response time tables be retained in the TS. The TS will retain the requirements related to operability, applicability, and the surveillance requirements, including the requirement to conduct testing to ensure the response times for RPS, IAS, and ECCS are within applicable limits, because of the importance of these systems in mitigating the consequences of an accident. The NRC staff considers the response times themselves to be an operational detail related to the licensee's safety analyses, which are generally discussed in the FSAR and controlled by review of changes against the criteria of 10 CFR 50.59. The continued processing of license amendments related to modification of the affected instrument response times, where the revisions to those times do not involve an unreviewed safety question under 10 CFR 50.59, would afford no significant benefit with regard to protecting the public health and safety. Further, the response time limits do not constitute a condition or limitation on operation necessary to obviate the possibility of an abnormal situation or event posing an immediate threat to the public health and safety, since the ability of the RPS, IAS, and ECCS to perform their safety functions is not affected by the relocation of the response time tables from the TS to the FSAR.

The NRC staff concludes that the changes do not alter the TS requirements to ensure that the response times of the RPS, IAS, and ECCS instruments are within their limits. In addition, the TS changes are consistent with the guidance provided in GL 93-08 and the requirements of 10 CFR 50.36. On these bases, the NRC staff concludes that the relocation of these response time limit tables from the TS to the FSAR is acceptable.



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4.0 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.

5.0 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 45036). 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: Jim Clifford

Date: June 26, 1995

