



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

April 30, 1996

Mr. J. V. Parrish (Mail Drop 1023)
Chief Executive Officer
3000 George Washington Way
Washington Public Power Supply System
P.O. Box 968
Richland, Washington 99352-0968

SUBJECT: CONVERSION TO IMPROVED TECHNICAL SPECIFICATIONS (ITS) - WASHINGTON
PUBLIC POWER SUPPLY SYSTEM NUCLEAR PROJECT NO. 2 (WNP-2)
(TAC NO. M94226)

Dear Mr. Parrish:

By letter dated December 8, 1995, you submitted an application for an amendment to Facility Operating License No. NPF-21 for WNP-2 to convert the current Technical Specifications (TS) in Appendix A of License No. NPF-21 to Improved Technical Specifications (ITS) consistent with NUREG-1434 "Standard Technical Specifications General Electric Plants, BWR-6" (STS). We have reviewed the proposed changes to determine those that constitute issues outside the scope of the conversion process. We intend to address as many of these as possible as part of the conversion. However, several of these changes from the current TS requirements involve changes in the licensing basis which cannot be justified on the basis of the content of the improved STS and warrant particular plant-specific justification. These issues are identified in the enclosure.

Certain of these issues may be difficult to resolve, and may unnecessarily delay timely completion of the conversion review. These are:

- Changes in the allowed outage times (AOTs) based on probabilistic risk analyses (PRA). The review guidelines for PRA-based changes to AOTs are still being developed, and will not likely be resolved in time to incorporate these changes into the ITS. (Items 13, 20, 26, and 28)
- The extension in the surveillance interval for the airlock interlock to 24 months is a pending generic change to the STS. If this change is resolved generically in the near term, it can be incorporated into the ITS for WNP-2. Conversely, if the generic basis for the change is not resolved soon, the change will have to be addressed with plant-specific justification or revert to the current TS requirement. (Item 21)
- The proposed changes to the voltage limits, frequency values and the number of required loss-of-power channels for the emergency electrical power system may require substantial staff review. Consequently, because of resource and scheduling constraints, these changes in the licensing basis may not be resolved in time to incorporate the changes into the ITS. (Items 17, 18 and 41).

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Mr. J. V. Parrish

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You should advise the staff whether you want to withdraw these changes from the conversion and pursue them at a later date, or pursue these changes separate from but in parallel with the conversion, with corresponding changes to your amendment request and ITS content.

In addition, you have parallel license amendment submittals, some of which are addressed in your cover letter for this amendment application, that must converge with the ITS prior to its issuance. Please inform us, as quickly as possible, of all such existing or planned submittals that are already reflected in or that must be incorporated in the ITS.

We will be sending you our questions and comments in the next week and anticipate a conference call and a possible meeting in early May. If you have any questions, please contact T. Wambach at (301) 415-1321.

Sincerely,

Original signed by S. Bloom for:

James W. Clifford, Senior Project Manager
Project Directorate IV-2
Division of Reactor Projects III/IV
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosure: Beyond Conversion Issues

cc w/encl: See next page

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CGrimes

DOCUMENT NAME: NPF-21.WNP

*See Previous Concurrence

OFC	PDIV-2/LA	PDIV-2	NRR:TSB*	PDIV-2/PM
NAME	EPeyton	TWambach:ye	CGrimes	JClifford
DATE	4/30/96	4/30/96	4/25/96	4/30/96

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Table 1

Mr. J. V. Parrish

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BEYOND CONVERSION ISSUES

1. Surveillance frequency changed from 18 months to 24 months for all surveillances normally performed at refueling outages.
2. LCO 3.1.4 and SR 3.1.4 - change to average scram time of 2x2 array of control rods with allowance for "slow" rods.
3. LCO 3.3.6.1 - delete isolation function of RHR shutdown cooling suction flow rate high.
4. LCO 3.3.7.1 - change proposed ACTION for inoperable CREFS radiation monitors.
5. LCO 3.3.8.1 - reduce number of required loss of voltage channels.
6. LCO 3.3.1.1 - revise STS ACTION for loss of one manual trip function to increase AOT from 1 hour to 12 hours.
7. SR 3.3.1.2.5 - note added which provides SR 3.0.1 exception for signal-noise ration.
8. LCO 3.3.3.1 - PAM function SR frequencies. Application of NEDO-30851-P-A to adopt a 6 hour AOT for required surveillances.
9. LCO 3.3.3.2 - delayed entry into TS ACTION for up to 6 hours to perform surveillance.
10. LCO 3.3.6.1 - delete ** Modes for reactor building exhaust radiation-high isolation signal for primary containment.
11. LCO 3.3.6.1 - deleted containment isolation functions.
12. LCO 3.3.6.2 - delete fuel handling sweep radiation monitor.
13. LCO 3.7.1 - increased SW system AOT.
14. LCO 3.3.6.1 - delete Mode 2 for SDC isolation on pump room high temperature and area ventilation delta T.
15. LCO 3.3.7.1 - delete requirement to isolate remote air intake if one of two radiation monitors is inoperable.
16. LCO 3.3.7.1 - restore inoperable air intake radiation monitor in 30 days vice CTS AOT of 7 days.
17. LCO 3.3.8.1 - all changes from CTS allowable values.
18. LCO 3.3.8.2 - all changes from CTS allowable values and new condition and applicability statements.

19. SR 3.4.8 - Note added to Table to allow a channel to be inoperable for 6 hours solely for performance of required SRs.
20. LCO 3.5.1 - extended AOTs for one low pressure ECCS subsystem, two low pressure ECCS subsystems, HPCS concurrent with one LPCI subsystem, and one ADS valve concurrent with one low pressure ECCS subsystem out of service.
21. SR 3.6.1.2.2 - decrease airlock interlock verification from 6 months to 24 months.
22. Current TS 3/4.6.1.6 - deletion of entire specification for drywell and suppression chamber pressure.
23. Current TS 4.6.2.2.b - remove surveillance test of RHR pump recirculation flow thru RHR HX and suppression pool sparger to plant controlled document.
24. LCO 3.6.2.3 - add allowance of 8 hours to restore one RHR suppression pool cooling subsystem to OPERABLE with both inoperable.
25. SR 3.6.2.3.2 - reduce required flow from 7450 gpm to 7100 gpm.
26. LCO 3.8.1 - increase AOTs for DGs.
27. SR 3.8.1 - increase start and load times for DGs from 10 to 15 seconds.
28. LCO 3.8.2 - increase in restoration completion time for DG-3 from 72 hours to 7 days.
29. SR 3.8.3.5 - decrease frequency of water check in diesel oil from 31 days to 92 days.
30. SR 3.8.4.2 and 5 - move resistance limits on connections to battery terminals to BASES.
31. SR 3.8.4.6 - reduce length of battery charger load test from 4 to 1.5 hours.
32. SR 3.8.4.1 - reduce battery terminal voltage from 258 to 252 volts and from 129 to 126 volts.
33. LCO 3.3.2.1 - adds "and with no peripheral control rod selected" to RBM operability.
34. LCO 3.3.3.1 JFD #18 - delete note to Condition C and Condition D for H₂ monitors.
35. LCO 3.3.4.2 - reduce frequency of reactor vessel pressure high ATWS-RPT function channel calibration from quarterly to 18 months.

36. LCO 3.4.7 - change CRS PIV test pressure from 935 ± 10 psig to 1035 psig.
37. LCO 3.4.1 - movement of power-to-flow map from LCO to the COLR.
38. LCO 3.5.1 - change in pressure for ADS operability from 128 psig to 150 psig.
39. LCO 3.5.2 - change in suppression pool level requirement in Modes 4 and 5 from 30 ft. 9 3/4 in. to 18 ft. 6 in.
40. 4.0 - change in water level requirement for SFP from 605 ft 7 in. to 583 ft. 1 1/4 in.
41. LCO 3.3.8.1 - reduction in number of required loss of power channels.

