



WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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Docket No. 50-397

December 8, 1995  
GO2-95-265

U.S. Nuclear Regulatory Commission  
Attn: Document Control Desk  
Washington, D.C. 20555

Gentlemen:

Subject: **WNP-2, OPERATING LICENSE NPF-21  
REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Reference: Letter GO2-95-261, dated November 23, 1995, JV Parrish (SS) to NRC,  
"Schedule for Implementing the Improved Technical Specifications (ITS)  
Program"

In accordance with the Code of Federal Regulations, Title 10, Parts 50.90 and 2.101, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications and Operating License. This proposed amendment revises the WNP-2 Technical Specifications to be consistent with NUREG-1434, "Standard Technical Specification General Electric Plants, BWR 6." The conversion to the improved Technical Specifications (ITS) includes deviations from the NUREG and changes to the current WNP-2 Technical Specifications. Because of the size of this submittal, the Project Manager, JW Clifford, will provide distribution of the document within the NRC.

There are three open items relative to this submittal. The first item involves proposed Specification 3.3.3.1, "Post Accident Monitoring Instrumentation." The Supply System License Condition 2.C.(16), Attachment 2, Item 3.(b) requires the post accident monitoring neutron flux instrumentation be classified as Category 1, Type A as described in Regulatory Guide 1.97. A request to amend the License Condition is being prepared for submittal. If the change to the License Condition is not approved, the ITS submittal will be revised. The second issue concerns the submittal and approval of the methodology used to develop the curves for the Pressure Temperature Limits Report (PTLR). The WNP-2 ITS was developed predicated on approval of the PTLR methodology. If not approved, the ITS submittal will be revised to include the requirements that have been proposed for relocation to the PTLR. The third issue concerns Cycle 12 specific information. A revision to the ITS submittal will be made upon completion of the Cycle 12 specific analysis. This is only expected to impact the Bases and Chapter 5.0.

Current License Condition 2.C.(18) requires the installation of an ADS manual inhibit switch, incorporation of the use of the switch into the Plant Emergency Procedure, and a Technical Specification requirement for the operability of the inhibit switch. The Technical Specification

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## REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS

requirement for the inhibit switch is proposed to be relocated from the Technical Specifications, since the inhibit switch does not meet the Final Policy Statement criteria for inclusion in Technical Specifications. Justification for this relocation is provided in this submittal. Therefore, it is requested that License Condition 2.C.(18) be modified to delete the ADS inhibit switch requirements related to Technical Specifications.

The implementation of the ITS will require the performance of a number of new surveillance requirements. The Supply System intends to treat these new requirements as being "met" at the time of implementation of the ITS, with the first performance scheduled to be completed within the required frequency from the implementation date. Several other surveillance frequencies will be extended from 18 to 24 months. Upon implementation of the ITS, the due date will be changed to reflect the new required frequency based on the last performance date. Any revisions to the FSAR necessitated by the conversion to the ITS will be submitted in accordance with the requirements of 10 CFR 50.71(e).

The following six attachments are included in this submittal:

1. Application of the Selection Criteria (Vol 1)
2. WNP-2 Technical Specifications (Vol 2)
3. Technical Specification Bases (Vols 3 and 4)
4. Comparison to Current Technical Specifications (Vols 5 and 6)
5. No Significant Hazards Considerations (Vol 7)
6. Deviations from NUREG-1434 (Vols 8, 9 and 10)

Enclosure 1 to this letter provides a description of each attachment and a brief discussion of the preparation of the submittal.

As discussed in a meeting held with the staff on November 29, 1995, there are some changes proposed that might be considered beyond the scope of conversion to ITS. Enclosure 2 to this letter provides a summary of these proposed changes.

The evaluations contained in Attachment 5, described above, conclude that the proposed changes to the WNP-2 Technical Specifications do not involve a significant hazards consideration. In addition, as discussed herein, the proposed changes do not create a potential for a significant change in the types or a significant increase in the amount of any effluent that may be released offsite, nor do the changes involve a significant increase in individual or cumulative occupational radiation exposure. Accordingly, the changes meet the eligibility criteria for a categorical exclusion as set forth in 10 CFR 51.22(c)(9). Therefore, in accordance with 10 CFR 51.22(b), an environmental assessment of the changes is not required.

This Technical Specification amendment request has been approved by the Plant Operations Committee and the Supply System Corporate Nuclear Safety Review Board. In accordance with 10 CFR 50.91, the State of Washington has also been provided a copy of this letter.

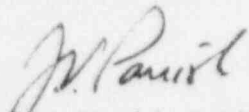
**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

Implementation of the proposed amendment is tentatively scheduled for the fourth quarter of 1996. This date is based on the training schedules for both licensed and nonlicensed personnel, the timing of the implementation with respect to the refueling outage, the licensed operator examination schedule, and the time required for procedure revisions and the development of the new programs. The Supply System will inform the NRC when the ITS implementation actions are complete. The implementation date is also predicated on NRC issuance of an SER in June 1996.

The Supply System requests a meeting at your earliest convenience to discuss a review schedule and the content of the submittal package.

Should you have any questions or desire additional information regarding this matter, please call me or D.A. Swank at (509) 377-4563.

Sincerely,



V.V. Parrish (Mail Drop 1023)  
Vice President, Nuclear Operations

MGE/lm

Attachments

1. Application of the Selection Criteria (Vol 1)
2. WNP-2 Technical Specifications (Vol 2)
3. Technical Specifications Bases (Vol 3 and 4)
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5. No Significant Hazards Considerations (Vol 7)
6. Deviations from NUREG-1434 (Vol 8, 9 and 10)

Enclosures

1. WNP-2 Improved Technical Specification Submittal Synopsis
2. Changes to WNP-2 Current Technical Specification

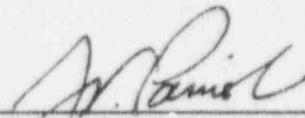
cc: LJ Callan - NRC RIV  
KE Perkins, Jr. - NRC RIV, Walnut Creek Field Office  
NS Reynolds - Winston & Strawn (w/o attachments)  
JW Clifford - NRC  
DL Williams - BPA/399 (w/o attachments)  
NRC Sr. Resident Inspector - 927N  
FS Adair - EFSEC

STATE OF WASHINGTON )  
 )  
COUNTY OF BENTON )

Subject: Request for Amendment to  
Technical Specifications


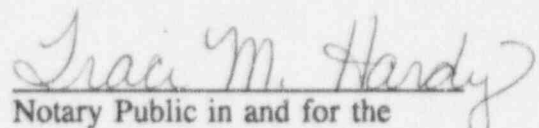
I, J. V. PARRISH, being duly sworn, subscribe to and say that I am the Vice President, Nuclear Operations for the WASHINGTON PUBLIC POWER SUPPLY SYSTEM, the applicant herein; that I have the full authority to execute this oath; that I have reviewed the foregoing; and that to the best of my knowledge, information, and belief the statements made in it are true.

DATE December 8, 1995

  
\_\_\_\_\_  
J. V. Parrish, Vice President  
Nuclear Operations

On this date personally appeared before me J. V. PARRISH, to me known to be the individual who executed the foregoing instrument, and acknowledged that he signed the same as his free act and deed for the uses and purposes herein mentioned.

GIVEN under my hand and seal this 8<sup>th</sup> day of December 1995.

  
  
\_\_\_\_\_  
Notary Public in and for the  
STATE OF WASHINGTON

Residing at Kennecook, WA

My Commission Expires 8/9/99

WNP-2 IMPROVED TECHNICAL SPECIFICATION SUBMITTAL SYNOPSIS

The Supply System Improved Technical Specifications (ITS) submittal consists of six documents contained in ten volumes. A brief description of each document is provided below:

ATTACHMENT 1 - APPLICATION OF THE SELECTION CRITERIA (Volume 1)

This attachment provides a discussion of the application of the NRC Final Policy Statement criteria to the current WNP-2 Technical Specifications (CTS). It includes a matrix that cross references the following documents:

- a) WNP-2 current Technical Specifications
- b) Proposed ITS, where applicable
- c) Applicable selection criteria.

Several Technical Specification requirements did not meet the selection criteria and have not been retained in the proposed ITS. This attachment includes an explanation of the application of the criteria for these relocated requirements.

ATTACHMENT 2 - WNP-2 TECHNICAL SPECIFICATIONS (Volume 2)

This attachment is the proposed WNP-2 ITS in the NUREG-1434 format. Relocated specifications are not included in the ITS volume.

ATTACHMENT 3 - WNP-2 ITS BASES (Volumes 3 and 4)

This attachment, the proposed WNP-2 Bases for the ITS, contains the basis for each proposed specification.

ATTACHMENT 4 - COMPARISON DOCUMENT (Volumes 5 and 6)

This attachment is a copy of the CTS annotated to show the disposition of the existing requirements into the ITS submittal. The CTS pages are presented in the order of the ITS requirements. For example, ITS 3.5.1 contains pages from applicable CTS sections of 3/4.5.1 and 3.3. The annotated CTS pages are followed by the discussion of each of the proposed changes.

The CTS pages reflect Amendments issued as of November 9, 1995 (correction to Amendment 137). No outstanding Technical Specification amendment requests are reflected in the CTS pages.

The ITS number is noted on the top right corner of each CTS page, indicating the ITS location of the CTS requirements. Items on the CTS page that are located in a different ITS location have the appropriate location noted adjacent to the item. When the ITS requirement differs from the CTS requirement, the CTS being revised is annotated with an alpha-numeric designator. This designator relates to the appropriate Discussion of Change (DOC). Each DOC provides

a justification for the proposed change. As discussed, the DOC associated with each ITS section immediately follows the marked up CTS pages. The alpha-numeric designator also relates the proposed change to the applicable no significant hazards consideration (NSHC) evaluation contained in Volume 7.

The marked CTS pages and the applicable DOCs for each Section in the ITS are followed by a page detailing which CTS pages have not been included because they were pages of the CTS Bases or pages "intentionally left blank" in CTS.

When a CTS page contains requirements that are located in more than one ITS section, the CTS page is repeated in each of the applicable ITS sections. The repeated page is annotated with alpha-numeric designators applicable only to the ITS section in which it is contained.

The alpha-numeric designator is based on the category of the change and a sequential number within that category. The changes to the CTS are categorized as follows:

- A ADMINISTRATIVE - associated with restructuring, interpretation, or rearranging of requirements, and other changes that do not revise existing requirements.
- R RELOCATED - specific LCO requirements that do not satisfy the NRC Final Policy Statement selection criteria.

#### TECHNICAL CHANGES

- M MORE RESTRICTIVE - proposed changes to the CTS that result in added restrictions or eliminated flexibility.
- L LESS RESTRICTIVE - proposed changes to the CTS that result in relaxed or eliminated requirements or new flexibility. The LESS RESTRICTIVE TECHNICAL CHANGES have been categorized as specific or generic. Each less restrictive specific change has a specific NSHC. The less restrictive generic changes have been divided into six groups; each group has a single NSHC. The generic groups are:
  - LA relocation of details from the CTS to a licensee controlled document;
  - LB extension of allowed outage times or surveillance test intervals based on NRC approved topical reports;
  - LC elimination of alarm or indication only instrumentation that does not meet the NRC Final Policy Statement selection criteria;
  - LD increasing the surveillance interval of 'R' from eighteen months to twenty four months, for surveillances other than CHANNEL CALIBRATIONS;
  - LE increasing the surveillance interval of 'R' from eighteen months to twenty four months for CHANNEL CALIBRATIONS; and

LF changes in instrumentation Allowable Values to be consistent with current setpoint calculations.

#### ATTACHMENT 5 - NO SIGNIFICANT HAZARDS CONSIDERATION (Volume 7)

This attachment, the 10CFR50.92 NSHCs for the proposed changes, shows that the changes do not constitute significant hazard considerations. As described for the DOC, the NSHC evaluations are categorized as Administrative, Relocated, More Restrictive, Less Restrictive - Generic, and Less Restrictive - Specific and are identified by an alpha-numeric designator relating the marked up CTS and the DOC to the applicable NSHC evaluation.

#### ATTACHMENT 6 - DEVIATIONS FROM NUREG-1434 (Volumes 8, 9, and 10)

This attachment contains a copy of NUREG-1434 annotated to indicate deviations taken in the development of the WNP-2 ITS. The justifications for the deviations follow the applicable Chapter or Section of the NUREG. The deviations are based upon Revision 1 of the NUREG as modified by generic changes submitted prior to November 30, 1995.

The deviations are identified as generic or plant specific. Generic changes to the NUREG are labeled with the applicable generic change package number. Plant specific deviations are indicated by small "bubbles," numbered sequentially.

## ENCLOSURE 2

### CHANGES TO WNP-2 CURRENT TECHNICAL SPECIFICATIONS

The Supply System has also taken the opportunity to propose changes outside the scope of the Improved Technical Specifications (ITS) conversion process. These changes are included in this submittal in lieu of submitting separate amendment requests for each of these changes. These changes are as follows:

- The RHR Shutdown Cooling Suction Flow Rate - High isolation instrumentation has been deleted from the Technical Specifications since other isolation instrumentation retained in the ITS provides adequate protection should a RHR line break occur. (ITS: 3.3.6.1, comment L.11)
- The Control Room Emergency Filtration System Actions have been modified to provide more appropriate Actions when one or more main control room ventilation radiation monitors (which provide only an alarm function) are inoperable. (ITS: 3.3.7.1, comments M.4, L.2, and L.3)
- The required number of Loss of Voltage channels for each division and the number of Degraded Voltage channels for Divisions 1 and 2 have been reduced by one. (ITS: 3.3.8.1, comment L.1)
- The Allowed Outage Times for one low pressure ECCS subsystem, two low pressure ECCS subsystems, HPCS concurrent with one LPCI subsystem, one ADS valve concurrent with one low pressure ECCS subsystem, one SW subsystem, one diesel generator, and two diesel generators out of service have been extended consistent with a GE analysis that is based upon WNP-2 plant-specific probabilistic safety assessment data. (ITS: 3.5.1, comment L.3; ITS: 3.7.1, comment L.1; and ITS: 3.8.1, comment L.3)
- The Primary Containment Internal Pressure LCO has been deleted since the upper limit cannot be exceeded without resulting in a reactor scram and the lower limit cannot be exceeded due to operation of the reactor building-to suppression chamber and suppression chamber-to drywell vacuum breakers. (CTS: 3/4.6.1.6, comment L.1)

In addition, the following changes have been proposed to match the current Technical Specifications requirements with the current setpoint calculations or analysis assumptions:

- Numerous instrumentation Allowable Values have been modified (both more and less restrictive with respect to the current Allowable Value). (ITS: 3.3.1.1, 3.3.4.2, 3.3.5.1, 3.3.5.2, 3.3.6.1, 3.3.6.2, 3.3.8.1, and 3.3.8.2, comment L.1; ITS: 3.3.4.2, comment M.2, ITS: 3.3.5.1, comments M.6 and M.7; ITS: 3.3.6.1, comment M.6; ITS: 3.3.8.1, comment M.4; and ITS: 3.3.8.2, comments M.2 and M.3)
- The number of required ADS valves has been reduced by one. (ITS: 3.5.1, comment L.1)
- The suppression pool cooling flow rate has been reduced from 7450 gpm to 7100 gpm. (ITS: 3.6.2.3, comment L.2)



- The diesel generator start time has been increased from 10 seconds to 15 seconds. (ITS: 3.8.1, comment L.20)

Current License Condition 2.C.(18) requires the installation of an ADS manual inhibit switch, incorporation into the Plant Emergency Procedures the usage of the inhibit switch, and Technical Specifications requirements for the inhibit switch. This Condition was met prior to startup from the first refueling outage as required. The Technical Specification requirements for the inhibit switch are proposed to be relocated from the Technical Specifications, since the inhibit switch does not meet the Final Policy Statement criteria for being included in Technical Specifications. Justification for this change is provided in the submittal. Therefore, it is requested that License Condition 2.C.(18) be modified to delete the ADS inhibit switch requirements related to Technical Specifications.