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WASHINGTON PUBLIC POWER SUPPLY SYSTEM

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April 24, 1996  
GO2-96-089

Docket No. 50-397

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

Gentlemen:

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

- References:
- 1) Letter GO2-95-104, dated June 6, 1995, JV Parrish (SS) to US Nuclear Regulatory Commission, "Request For Amendment To Technical Specifications: Revision To Section 6.9.3.2 - Implementation Of Generic Letter 88-16"
  - 2) Letter GO2-95-265, dated December 8, 1995, JV Parrish (SS) to US Nuclear Regulatory Commission, "Request For Amendment To Technical Specifications"
  - 3) S. Levy Report SLI 96-04 dated February 1996, "An Assessment Of The ABB Method For Determining Critical Power For The Resident SPC 9x9-9 Fuel Assemblies in The WNP-2 Core"
  - 4) Letter GI2-94-308, dated October 12, 1994, JW Clifford (NRC) to JV Parrish (SS) "Approval of Topical Report FTS-131, 'Applications Topical Report For BWR Design and Analysis,' For The WPPSS Nuclear Project No. 2 (Tac No. M81723)"
  - 5) Letter GI2-96-028, dated January 22, 1996, JW Clifford (NRC) to JV Parrish (SS) "Revised Safety Evaluation For Approval Of Topical Report FTS-131, 'Applications Topical Report For BWR Design And Analysis,' For The WPPSS Nuclear Project No. 2 (Tac Nos. M81723 and M94055)"

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**REQUEST FOR AMENDMENT TO TECHNICAL SPECIFICATIONS**

In accordance with the Code of Federal Regulations, Title 10, Parts 2.101 and 50.90, the Supply System hereby submits a request for amendment to the WNP-2 Technical Specifications. This request supersedes the pending request submitted by Reference 1 which is hereby withdrawn.

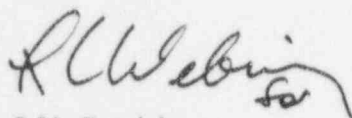
The amendment being proposed by this letter would modify the WNP-2 Technical Specifications to support Cycle 12, scheduled to begin subsequent to the Spring 1996 outage. A discussion of these changes is included in Attachment 1, and details of the proposed changes are shown in Attachment 2. The Bases will be updated by the Supply System upon approval of this proposed amendment.

As discussed in Attachment 3, the Supply System has concluded that the proposed change to the WNP-2 Technical Specifications does not involve a significant hazards consideration. In addition, the proposed changes do not create the potential of a significant change in the types of, or a significant increase in the amounts 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 proposed 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 change is not required.

This Technical Specification amendment request has been reviewed and approved by the WNP-2 Plant Operations Committee and the Supply System Corporate Nuclear Safety Review Board. The State of Washington has been provided a copy of this letter in accordance with 10 CFR 50.91.

Should you have any questions or desire additional information, please call me or Ms. Lourdes Fernandez at (509)-377-4147.

Sincerely,



J.V. Parrish  
Chief Executive Officer  
(Mail Drop 1023)

Attachments

cc: LJ Callan - NRC RIV  
KE Perkins, Jr. - NRC RIV, WCFO  
NS Reynolds - Winston & Strawn  
FS Adair - EFSEC  
JW Clifford - NRC  
DL Williams - BPA/399  
NRC Sr. Resident Inspector - 927N

STATE OF WASHINGTON )

Subject: Request for Amendment to  
Technical Specifications

COUNTY OF BENTON )

I, R.L. Webring, being duly sworn, subscribe to and say that I am the Vice President, Operations Support/PIO of 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 4/24, 1996

R.L. Webring  
R.L. Webring, Vice President, Operations Support/PIO

On this day personally appeared before me R.L. Webring, 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 24 day of April 1996.

B. [Signature]  
Notary Public in and for the STATE OF WASHINGTON

Residing at Kennewick, WA

My Commission Expires 4/28/98

## ATTACHMENT 1

### Discussion of Changes Proposed For Technical Specifications Sections 5.3.1 and 6.9.3.2

#### Section 5.3.1

The proposed change to Section 5.3.1 of the current Technical Specification would replace the current wording with that of Section 4.2.1 (also entitled "Fuel Assemblies") of the Improved Technical Specifications (ITS) submitted by Reference 2. Since the current Technical Specifications are expected to be replaced by the ITS during the fourth quarter of 1996, the proposed wording is identical with that being reviewed by the NRC to facilitate preparation of the required Safety Evaluation, and is proposed to minimize the changes that the Supply System and the NRC must deal with during the transition to the ITS.

#### Section 6.9.3.2

The changes proposed for Section 6.9.3.2 include deletion of existing items 4, 5, 6, 7, and 8 which define core reload methodologies no longer pertinent to determining WNP-2 core operating limits. The list is to be renumbered to reflect these deletions, and NRC approved methodologies authored by ABB CENO Fuel Operations (ABB) and the Supply System are proposed for inclusion as items 11 and 12 respectively.

The items being retained in Section 6.9.3.2 define the methodologies used to analyze various aspects of operation for the currently approved fuel assemblies which will make up approximately 80% of the reactor core during Cycle 12. Consequently, it is necessary to retain several NRC approved reports in Section 6.9.3.2 because the scope of those reports is such that they each cover only some aspects of the required analysis. The ABB and Supply System methodologies are equally complex and consist of a number of sub-processes, but the ABB and NRC approved Supply System reports included as items 11 and 12 summarize the salient details for the entire analytical process.

The ABB analytical methodology defined by the proposed Item 11 will be used to prepare the Cycle 12 and 13 Core Operating Limits Report (COLR) which will provide the limits invoked by Technical Specifications 3.2.1, 3.2.3, and 3.2.4. The Cycle 12 and 13 core configuration will include 10x10 fuel assemblies manufactured by ABB as well as 8x8 and 9x9 fuel assemblies manufactured by the Siemens Power Corporation (SPC). The ABB methodology has been determined to have the capability to correctly define operating limits for a core consisting of SPC and ABB fuel assemblies. The ABB methodology will be utilized only within the range of operating parameters for which the methodology has been validated, as discussed below.

As part of validating the ABB methodology, both the SPC and ABB methodologies were used to calculate critical power ratios for SPC 9x9 fuel assemblies. The outputs of both analyses were compared to industry test data pertinent to 9x9-9 fuel assemblies. The comparison demonstrated there is more than 95% confidence that calculations performed using the ABB

## ATTACHMENT 1

methodology bound 95% of calculations performed per the SPC methodology for all applicable test data, which encompass the normal range of operation of WNP-2. The SPC methodology had been previously determined by the NRC to be acceptable for use in determining critical power ratios for BWR cores including a mixture of 8x8 and 9x9 fuel assemblies produced by different manufactures. Consequently, the correction or adder factor required to establish equivalence between the ABB and SPC methodologies is zero. This validation was performed by an independent consultant, at the request of the Supply System and is documented in Reference 3. This report is available for your review at WNP-2.

Current plans are to utilize the services of ABB for design and necessary analyses of Cycles 12 and 13 reactor cores. The Supply System methodology, approved by the NRC in References 4 and 5, is being included in Section 6.9.3.2 to allow use of either the ABB or Supply System methodology to support potential future use.