

January 28, 2000

Mr. J. V. Parrish
Chief Executive Officer
Energy Northwest
P.O. Box 968 (Mail Drop 1023)
Richland, WA 99352-0968

SUBJECT: WNP-2 - ISSUANCE OF AMENDMENT RE: TECHNICAL SPECIFICATION
SURVEILLANCE REQUIREMENTS (SR) 3.8.4.6 AND 3.8.5.1 (TAC NO.
MA6169)

Dear Mr. Parrish:

The Commission has issued the enclosed Amendment No. 160 to Facility Operating License No. NPF-21 for WNP-2. The amendment consists of changes to Surveillance Requirements (SR) 3.8.4.6 of Technical Specification (TS) 3.8.4, "DC Sources - Operating" and SR 3.8.5.1 of TS 3.8.5, "DC Sources - Shutdown" in response to your application dated July 29, 1999, as supplemented by letter dated October 20, 1999.

The change to SR 3.8.4.6 prohibits surveillance testing of Division 1, 2, and 3, 125 and 250 volt DC, battery charger capacity during Modes 1, 2 and 3. However, credit may be taken for unplanned events that satisfy this surveillance requirement. The change to SR 3.8.5.1 includes SR 3.8.4.6 as one of the surveillance tests that are not required to be performed if performance of the test would result in the inoperability of the affected DC system while it was required for service.

A copy of the related Safety Evaluation is also enclosed. The Notice of Issuance will be included in the Commission's next biweekly Federal Register notice.

Sincerely,

/RA/

Jack Cushing, Project Manager, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket No. 50-397

Enclosures: 1. Amendment No. 160 to NPF-21
2. Safety Evaluation

cc w/encls: See next page

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WNP-2

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ENERGY NORTHWEST

DOCKET NO. 50-397

WNP-2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 160
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Energy Northwest (licensee, formerly known as Washington Public Power Supply System) dated July 29, 1999, as supplemented by letter dated October 20, 1999, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act) and the Commission's regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.
2. Accordingly, the license is amended by changes to the Technical Specifications as indicated in the attachment to this license amendment and paragraph 2.C.(2) of Facility Operating License No. NPF-21 is hereby amended to read as follows:

(2) Technical Specifications and Environmental Protection Plan

The Technical Specifications contained in Appendix A, as revised through Amendment No. _____ and the Environmental Protection Plan contained in Appendix B, are hereby incorporated in the license. The licensee shall operate the facility in accordance with the Technical Specifications and the Environmental Protection Plan.

3. The license amendment is effective as of its date of issuance and shall be implemented within 30 days from the date of issuance.

FOR THE NUCLEAR REGULATORY COMMISSION

/RA/

Stephen Dembek, Chief, Section 2
Project Directorate IV & Decommissioning
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Technical
Specifications

Date of Issuance: January 28, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 160

FACILITY OPERATING LICENSE NO. NPF-21

DOCKET NO. 50-397

Replace the following pages of the Appendix A Technical Specifications with the attached revised pages. The revised pages are identified by amendment number and contain vertical lines indicating the areas of change.

REMOVE

3.8-27

3.8-28

3.8-30

INSERT

3.8-27

3.8-28

3.8-28a

3.8-30

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 160 TO FACILITY OPERATING LICENSE NO. NPF-21

ENERGY NORTHWEST

WNP-2

DOCKET NO. 50-397

1.0 INTRODUCTION

By application dated July 29, 1999, as supplemented by letter dated October 20, 1999, Energy Northwest (the licensee, formerly known as the Washington Public Power Supply System) requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-21) for WNP-2. The proposed changes would revise Surveillance Requirements (SR) 3.8.4.6 of Technical Specification (TS) 3.8.4, "DC Sources - Operating" and SR 3.8.5.1 of TS 3.8.5, "DC Sources - Shutdown."

The change to SR 3.8.4.6 prohibits surveillance testing of Division 1, 2, and 3, 125 and 250 volt DC, battery charger capacity during Modes 1, 2 and 3. However, credit may be taken for unplanned events that satisfy this surveillance requirement. The change to SR 3.8.5.1 is to add SR 3.8.4.6 to the note as one of the surveillance tests that are not required to be performed if performance of the test would result in the inoperability of the affected DC system while it was required for service.

The October 20, 1999, supplemental letter corrected the page numbering of the technical specifications and did not expand the scope of the application as originally noticed and did not change the staff's original no significant hazards consideration determination published in the Federal Register on August 25, 1999 (64 FR 46432).

2.0 BACKGROUND

SR 3.8.4.6 requires the licensee to verify that each required battery charger supplies the required load for greater than or equal to 1.5 hours. Performance of the surveillance test requires the installation of test equipment, including an electrical load bank, to increase the battery charger output to the specified test acceptance criteria. The installation of the test equipment requires the affected DC system to be declared inoperable.

The licensee misinterpreted a statement in Section 8.3.2 of the WNP-2 Final Safety Analysis Report (FSAR), when WNP-2 converted to the improved Technical Specifications. Section 8.3.2 of the FSAR states that "A spare charger of the same rating is available for replacement." The licensee interpreted that statement as WNP-2 had an installed spare battery charger that could be placed in service and then SR 3.8.4.6 capacity surveillance test could be performed on the battery charger that had been removed from service without rendering the affected DC system inoperable. In fact, the spare battery charger that the statement in the FSAR referred to was not an installed spare.

On the basis of the misinterpretation, two deviations to NUREG-1434, "Standard Technical Specifications, General Electric Plants, BWR-6," were approved. The first deviation omitted a note from SR 3.8.4.6 that prohibited performance of surveillance testing of battery charger capacity during Modes 1, 2, and 3, and allowed taking credit for unplanned events that satisfied the surveillance. The second deviation omitted SR 3.8.4.6 from a note in SR 3.8.5.1 that states that certain SRs are not required to be performed if performing them would result in the inoperability of a DC system required for service.

The result of the SR 3.8.4.6 deviation was that the battery charger capacity surveillance, which would make the affected DC system inoperable, could be performed during Modes 1, 2, and 3 when the system is required to be operable. The result of the SR 3.8.5.1 deviation was that the surveillance, which would make the affected DC system inoperable, could be performed during Modes 4 and 5 when the system is required to be operable. This situation was recognized and the licensee instituted administrative controls to prohibit testing during Modes 1, 2, and 3 and submitted this proposed amendment to correct the technical specifications.

3.0 EVALUATION

Section 50.36, "Technical Specifications" of Title 10 of the Code of Federal Regulations, requires, in part, that TS limiting conditions for operation (LCO) specify, at a minimum, the lowest functional capability or performance level of equipment required for the safe operation of the facility. In addition, 10 CFR 50.36 requires, in part, that TS include surveillance requirements that assure that the necessary quality of systems and components are maintained and that the limiting conditions for operation will be met.

Generic Letter (GL) 91-18, Revision 1, "Information to Licensees Regarding NRC Inspection Manual Section on Resolution of Degraded and Nonconforming Conditions," provides guidance to licensees on the type and time frame of any required corrective action. The guidance states that whenever degraded or nonconforming conditions are discovered, 10 CFR Part 50, Appendix B, requires prompt corrective action to correct or resolve the condition. In the case of a deficient TS, this includes the evaluation of compensatory measures, such as administrative controls, in accordance with 10 CFR 50.59, and prompt actions to correct the TS. If the licensee does not resolve the degraded or nonconforming condition, the staff would conclude that corrective action has been inadequate and would consider taking enforcement action.

In summary, the discovery of an improper or inadequate TS value or required action is considered a degraded or nonconforming condition as defined in GL 91-18. Imposing administrative controls in response to an improper or inadequate TS is considered an acceptable short-term corrective action. The staff expects that, following the imposition of administrative controls, an amendment to the TS, with appropriate justification and schedule, will be submitted in a timely fashion. Once any amendment correcting the TS is approved, the licensee must update the Final Safety Analysis Report (FSAR), as necessary, to comply with 10 CFR 50.71(e).

The licensee imposed administrative controls and submitted this TS amendment to correct SRs 3.8.4.6 and 3.8.5.1.

SR 3.8.4.6 in NUREG-1434 contains a note that prohibits performance of SR 3.8.4.6 during Modes 1, 2 and 3. The basis for this note is that performing this surveillance would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and could challenge safety systems. SR 3.8.5.1 in NUREG-1434 is also modified by a note that states that SR 3.8.4.6 is not required to be performed during Modes 4 and 5 if performing them would result in the inoperability of a DC system required for service. The reason for this note is to preclude requiring operable DC sources required to be in service from being discharged below their capability to provide the required power supply or otherwise rendered inoperable during the performance of surveillance requirements.

The staff notes that the proposed amendment removes the deviations from NUREG 1434, which were approved for SR 3.8.4.6 and SR 3.8.5.1, and adds the standard Mode restriction on performing SR 3.8.4.6 and SR 3.8.5.1. The basis for the Mode restrictions on performance of SR 3.8.4.6 and SR 3.8.5.1 is that performing the surveillance requirements would remove a required DC electrical power subsystem from service, perturb the electrical distribution system, and could challenge safety systems. Because WNP-2 does not have an installed spare battery charger, the basis for the mode restriction is applicable to WNP-2. Therefore, since conducting the surveillances would remove required DC subsystems and could challenge safety systems, the staff concludes that it is acceptable to remove the deviations and follow the standard Mode restrictions of NUREG-1434.

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.

4.0 ENVIRONMENTAL CONSIDERATION

The amendment 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 (64 FR 46432). 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: Jack Cushing

Date: January 28, 2000