

March 9, 2000

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SUBJECT: WNP-2 - ISSUANCE OF AMENDMENT RE: TECHNICAL SPECIFICATION
3.3.6.1 (TAC NO. MA7031)

Dear Mr. Parrish:

The Commission has issued the enclosed Amendment No. 161 to Facility Operating License No. NPF-21 for WNP-2. The amendment removes footnote (d) from Function 5, "RHR SDC System Isolation" of Technical Specification (TS) Table 3.3.6.1-1 "Primary Containment Isolation Instrumentation" and reletters footnote (e) as footnote (d) for consistency.

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. 161 to NPF-21
2. Safety Evaluation

cc w/encls: See next page

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

ENERGY NORTHWEST

DOCKET NO. 50-397

WNP-2

AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 161
License No. NPF-21

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Energy Northwest dated October 13, 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. 161 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



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: March 9, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 161

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

3.3-57
3.3-58

INSERT

3.3-57
3.3-58

Primary Containment Isolation Instrumentation
3.3.6.1

Table 3.3.6.1-1 (page 3 of 4)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE NODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
4. RWCU System Isolation (continued)					
d. Heat Exchanger Room Area Temperature - High	1,2,3	1	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 160°F
e. Heat Exchanger Room Area Ventilation Differential Temperature - High	1,2,3	1	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 70°F
f. Pump Room Area Temperature - High	1,2,3	1 per room	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 180°F
g. Pump Room Area Ventilation Differential Temperature - High	1,2,3	1 per room	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 100°F
h. RWCU/RCIC Line Routing Area Temperature - High	1,2,3	1	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 180°F
i. RWCU Line Routing Area Temperature - High	1,2,3	1 per room	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	
Room 409, 509 Areas					≤ 175°F
Room 408, 511 Areas					≤ 180°F
j. Reactor Vessel Water Level - Low Low, Level 2	1,2,3	2	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ -58 inches
k. SLC System Initiation	1,2	2 ^(c)	I	SR 3.3.6.1.6	NA
l. Manual Initiation	1,2,3	2	G	SR 3.3.6.1.6	NA
5. RHR SDC System Isolation					
a. Pump Room Area Temperature - High	3	1 per room	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 150°F

(continued)

(c) SLC System Initiation only inputs into one of the two trip systems.

Primary Containment Isolation Instrumentation
3.3.6.1

Table 3.3.6.1-1 (page 4 of 4)
Primary Containment Isolation Instrumentation

FUNCTION	APPLICABLE NODES OR OTHER SPECIFIED CONDITIONS	REQUIRED CHANNELS PER TRIP SYSTEM	CONDITIONS REFERENCED FROM REQUIRED ACTION C.1	SURVEILLANCE REQUIREMENTS	ALLOWABLE VALUE
5. RHR SDC System Isolation (continued)					
b. Pump Room Area Ventilation Differential Temperature - High	3	1 per room	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 70°F
c. Heat Exchanger Area Temperature - High	3	1 per room	F	SR 3.3.6.1.3 SR 3.3.6.1.4 SR 3.3.6.1.6	
Room 505 Area					≤ 140°F
Room 507 Area					≤ 160°F
Room 605 Area					≤ 150°F
Room 606 Area					≤ 140°F
d. Reactor Vessel Water Level - Low, Level 3	3,4,5	2 ^(d)	J	SR 3.3.6.1.1 SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≥ 9.5 inches
e. Reactor Vessel Pressure - High	1,2,3	1	F	SR 3.3.6.1.2 SR 3.3.6.1.4 SR 3.3.6.1.6	≤ 135 psig
f. Manual Initiation	1,2,3	2	G	SR 3.3.6.1.6	NA

(d) Only one trip system required in MODES 4 and 5 with RHR Shutdown Cooling System integrity maintained.



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

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION
RELATED TO AMENDMENT NO. 161 TO FACILITY OPERATING LICENSE NO. NPF-21
ENERGY NORTHWEST
WNP-2
DOCKET NO. 50-397

1.0 INTRODUCTION

By application dated October 13, 1999, Energy Northwest requested changes to the Technical Specifications (Appendix A to Facility Operating License No. NPF-21) for WNP-2. The proposed changes would revise Technical Specification (TS) Table 3.3.6.1-1, Primary Containment Isolation Instrumentation, Function 5, "RHR SDC System Isolation" by removing footnote (d) and relettering footnote (e) as footnote (d) for consistency.

2.0 BACKGROUND

The residual heat removal (RHR) shutdown cooling (SDC) system has two valves, RHR-V-8 and RHR-V-9, in series that isolate the high pressure portion of the RHR SDC system from the low pressure portion of the RHR SDC system. RHR-V-8 is the outboard suction isolation valve and RHR-V-9 is the inboard suction isolation valve. The valves automatically isolate the SDC system at pressures greater than 135 psig to prevent overpressurizing the low pressure side of the RHR SDC system.

By letter dated May 26, 1988, the NRC issued amendment No. 58 to Facility Operating License No. NPF-21 for WNP-2. Amendment No. 58 added footnote (d) to TS Table 3.3.6.1-1. Footnote (d) states, "Only the inboard trip system [RHR-V-9] is required in Modes 1, 2, and 3, as applicable, when the outboard valve control is transferred to the alternate remote shutdown panel and the outboard valve is closed." Footnote (d) was needed to recognize the inoperability of the isolation logic for RHR-V-8, the outboard trip system, when control power was transferred from the control room to the alternate remote shutdown panel (ARSP).

Control power for RHR-V-8 was transferred to control a portion of the high/low pressure interface in the residual heat removal (RHR) shutdown cooling (SDC) system in the event of a control room fire. The concern was with the control power for both RHR-V-8 and RHR-V-9 located in the control room that a fire in the control room could cause short circuits that could result in both valves inadvertently opening, thereby exposing the low pressure portion of RHR SDC to higher than design pressure. To ensure a control room fire would not impact the control for the valve, RHR-V-8 transfer switch located at the alternate remote shutdown panel (ARSP)

was placed in the "Emergency" position during Modes 1, 2, and 3. The "Emergency" position bypasses the control room circuits for RHR-V-8, thereby preventing the inadvertent opening of the valve in the event of a control room fire.

As part of the Thermo-Lag closeout work, a plant modification was performed in 1998 to provide new power feeders and related components such as cables, conduit, fire rated wraps for supports, and penetration sealant for inboard RHR system high/low pressure interface valve RHR-V-9. The disconnect for RHR-V-9 was also relocated from outside the reactor building to a compatible fire area in order for the switch to remain operable during accident conditions. The isolation logic and circuitry for RHR-V-9 remained unchanged by the plant modification. However, the licensee decided to isolate valve motor power by administratively maintaining open the fused disconnect switch.

RHR-V-9 was now protected from opening in the event of a control room fire by having an administratively maintained open fused disconnect located outside the control room. The licensee determined that RHR-V-9 could now serve as the hi/low pressure interface isolation system during a fire in the control room instead of RHR-V-8. Based on this determination, the licensee no longer transferred control power for RHR-V-8 to the ARSP. The isolation logic and circuitry for both RHR-V-8 and RHR-V-9 are available; therefore, footnote (d) is no longer needed.

The licensee recognized that footnote (d) was no longer necessary and instituted administrative controls to maintain the hi/low interface operable, in the event of a control room fire with RHR-V-9 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 condition for operation (LCO) specify, at a minimum, the lowest functional capability or performance level of equipment required for the safe operation of the facility.

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 is, 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, as necessary, to comply with 10 CFR 50.71(e).

The licensee instituted administrative controls and submitted this proposed amendment to remove footnote (d) from Function 5 of TS Table 3.3.6.1-1.

The staff evaluated whether RHR-V-9 met its safety functions when the valve was closed and power was removed from the valve motor, with the control logic still energized. The evaluation is discussed below.

RHR-V-9 is one of the hi/low pressure interface isolation valves for RHR SDC. The safety function of the SDC hi/low interface isolation system is to isolate the low pressure side of SDC from the high pressure side when reactor vessel pressure is greater than 135 psig. RHR-V-9 being deactivated in the closed position by a fused disconnect located outside the control room satisfies this function even in the event of a control room fire. In addition, if power is returned to motor for RHR-V-9, the control logic to send a signal to close RHR-V-9 is available.

In addition to being one of the hi/low pressure interface isolation valves for RHR SDC, RHR-V-9 is also a primary containment isolation valve (PCIV). Automatic PCIVs are considered operable when they are deactivated and secured in the closed position. Therefore, RHR-V-9 meets its containment isolation function when it is deactivated and secured in its closed position.

The control logic for RHR-V-9 sends a closed signal to RHR-V-9 if any of the following conditions exist:

- a. Reactor pressure vessel low level
- b. RHR area high temperature
- c. RHR ventilation high delta temperature
- d. Reactor pressure vessel pressure greater than 135 psig

Being deactivated in its closed position, RHR-V-9 is already in its safety position and therefore satisfies the safety functions listed above. When reactor pressure is low enough that power can be restored to RHR-V-9, the interlocks above will be available to satisfy RHR-V-9 safety functions without the concern of a control room fire causing an overpressurization of the low pressure portion of the SDC.

RHR-V-9 control logic also provides input to the suction path trip for the RHR pumps. This input is still available with RHR-V-9 deactivated in the closed position and therefore the suction path trip for the RHR pumps is still operable.

Therefore, since both the inboard and the outboard trip systems are operable, the staff concludes that it is acceptable to remove footnote (d) from TS Table 3.3.6.1-1, Primary Containment Isolation Instrumentation, Function 5, "RHR SDC System Isolation" and reletter footnote (e) as footnote (d) for consistency. In addition the staff finds that RHR-V-9 meets its safety function when de-activated in the closed position with the control logic energized.

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 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. 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 70082). 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: March 9, 2000