



Wisconsin Electric POWER COMPANY
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September 20, 1979

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. A. Schwencer, Chief
Operating Reactors Branch 1

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
SUPPLEMENTAL INFORMATION IE BULLETIN 79-06A
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On September 14, 1979, we discussed, in a telephone conversation with Mr. Trammell of your Staff, several outstanding concerns which the NRC had with our previous replies to the requests for additional information relating to IE Bulletins 79-06A and 79-06A Revision 1. As a result of these conversations, we are providing herewith additional information concerning several of the issues contained in these bulletins. This information is contained in the enclosure to this letter. The items are numbered to correspond to the respective bulletin items.

We wish to stress that the information provided herewith is supplemental to that information previously transmitted with our letters dated April 27, 1979 and August 23, 1979. The information contained in these previous transmittals is still fully applicable and relates the current schedule for incorporating the results of the Westinghouse Owners' Group technical and procedure evaluations. Should you have any questions concerning the attached information, do not hesitate to contact us.

Very truly yours,

C. W. Fay, Director
Nuclear Power Department

Enclosures

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SUPPLEMENTAL INFORMATION TO
IE BULLETIN 79-06A AND 79-06A REVISION 1
REPLIES BY WISCONSIN ELECTRIC POWER COMPANY

2. Specific guidance has been given to all operators via Special Order PBNP 79-18, "Voiding and Natural Circulation", issued September 18, 1979 (attached). Covered in detail are the problems, action required, and instrumentation available for the recognition of core voiding and the establishment of natural circulation.

To prevent voiding, it is stressed that pressurizer level be maintained and that reactor coolant pressure should be established at greater than 100 psi over the saturation pressure for accident conditions involving a loss of coolant. Caution against securing safety injection notes that no primary system overpressurization problem should exist on the PBNP design for continued operation. Startup testing at PBNP has verified the initial establishment of natural circulation. Monitoring of natural circulation flow stresses maintaining a core delta "T" of 60 degrees or less and holding steady or decreasing and verification of auxiliary feed-water flow, steam generator level, and steaming.

Any further procedure changes will be a result of Wisconsin Electric Power Company's participation as a member of the Westinghouse Owners' Group comprehensive review of emergency procedures consistent with the schedule stated previously.

8. The complete valve lineups made on all safety-related systems at the end of each refueling include locked valves.. Examination is for both proper alignment and lock integrity in these cases. During these lineups, no valves in the systems are inaccessible for checking. Monthly checks cover only accessible valves and include locked valves that are accessible.
10. It is the responsibility of the Duty Shift Supervisor to maintain compliance with the Technical Specifications and ensure that safety-related equipment is not removed from service when redundant equipment is already out of service. This responsibility extends to maintenance of the out-of-service status board, for each unit individually, with respect to the listing and status of safety-related equipment. Verification of operability of redundant equipment is provided for by visual inspection of the system or equipment status as displayed in the control room. Identification on the main control board by the appropriate isolation tags for safety-related equipment taken out of service, recording of the equipment and time of removal from service in the log, and the close proximity of the redundant equipment controls ensure the stated compliance with the Technical Specifications.

11. As stated previously, we have revised our procedures to ensure NRC notification within one hour of the time the reactor is not in a controlled or expected condition of operation.

Specific written guidance was given by the Manager, Nuclear Operations - Point Beach Nuclear Plant on May 24, 1979, to all Duty Shift Supervisors and Duty and Call Superintendents for immediate reporting to the NRC of incidents covered by and beyond those committed to in the Technical Specifications (attached). "Immediate reporting" was defined as one hour or less with stress on more rapid reporting of more serious incidents (like a LOCA). Incident reports "beyond those committed to in the Technical Specifications" include those that, in the judgment of the Duty Shift Supervisor, Duty and Call Superintendent, or other responsible plant management, could become media sensitive or important to the NRC with respect to being informed.

12. The normal reactor coolant system degassification procedure, OP-5D, covers the capability available and process of venting hydrogen and other non-condensable gases from the pressurizer steam space. This can be accomplished through the steam space sample line (vent) via the sample sink connecting to the volume control tank. The gases can then either be vented to the waste gas system or the hydrogen redissolved into the primary water for reuse. Incorporation of this or other methods for degassification (i.e., use of PORVs) into emergency procedures will be based on the review of inadequate core cooling by the Westinghouse Owners' Group. The schedule for incorporating any changes into the appropriate procedures is the same as that previously provided in response to Item 2.
13. One Technical Specification change dealing with the modification to the safety injection actuation logic from a one-of-three coincident low pressurizer pressure and low pressurizer level to a two-out-of-three low pressurizer pressure has been reviewed and approved by the NRC. Additional changes to the Technical Specifications are not required and no other design changes are needed in order to effect long term resolution of the items in Bulletin 79-06A.

Special Order

OPERATIONS GROUP
VOIDING AND NATURAL CIRCULATION

This special order is being issued to give interim guidance to all operators on the problems and action required in recognition of core voiding and to recognize and take proper operational steps to maximize natural circulation.

The permanent changes to EOP's will be developed using this, Westinghouse input, and any other pertinent data. It is anticipated that the procedure changes will be made in the next couple of months.

Background

Three Mile Island has shown the inherent problems that exist in a PWR when control of water inventory is lost. The problems of the Babcock and Wilcox design in establishment of natural circulation certainly made Three Mile Island significantly worse. However, a major lesson to be learned, if it isn't already known, is the overriding importance of water mass inventory and control in all PWR designs.

Guidance

The following guidance is promulgated both as operator instructions and as additional thought provoking areas.

Void Recognition

The prime instrumentation we have to insure prevention of a void condition are the pressurizer levels. It is, therefore, a basic thrust of all accident operations involving the loss of coolant that we establish a plant condition where reactor coolant pressure is greater than 100 psi over the saturation pressure (using reactor coolant thermocouples versus the temperature pressure charts to obtain saturation pressure) and with a known pressurizer level.

This condition is, therefore, the first and mandatory condition we must be in before any consideration be given to securing safety injection. As a general rule in the PSNP design, safety injection pumps should not be secured on a loss of coolant accident until stable plant conditions are achieved and verified through redundant plant instrumentation. No primary system overpressurization problem should exist on the PSNP design in view of safety injection system pump pressure design.

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Natural Circulation

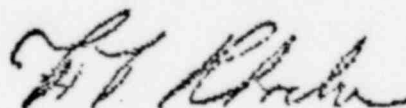
The establishment of natural circulation in the PBMP design has been verified by startup testing and other tests and will initiate in the case of loss of AC or reactor coolant pump tripping. The basic parameters to be watched in this case are the delta "T" between core outlet thermocouples and wide range "T" cold, steam generator pressure and verification of proper auxiliary feedwater flow and proper steaming of the steam generators.

Guidance

If the reactor incore thermocouple temperature minus the loop cold leg temperature is 60 degrees or less and holding steady or decreasing, natural circulation has been established. If the delta "T" is increasing, or steam generator pressure is abnormally low, (steam generator pressure less than saturation temperature for the coolant real Tavg) operator action should be immediately directed to two areas:

1. Verify auxiliary feedwater flow and verify steaming on the steam generators, increase it if possible, insure steam generator level is on the narrow range; i. e., above the tube bundle.
2. Reverify as soon as possible that a loss of mass inventory has been corrected or is in the process of being corrected.

F. T. Rhodes



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cc: Standard Distribution

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May 24, 1978 In:

Duty & Call Superintendents
Duty Shift Supervisors

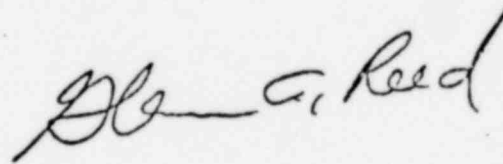
INCIDENT REPORTING

The regional office of the NRC and top management of the Company have recently restressed the importance of immediate reporting to the NRC of plant incidents even beyond those absolutely committed to in the Technical Specifications. Such incidents would be those that in the judgment of the Duty Shift Supervisor and the Duty & Call Superintendent could become media sensitive, or important to the NRC with respect to being informed.

Therefore, in your normal wheeling and internal reporting of incidents on backshifts, the Duty Shift Supervisor and Duty & Call Superintendent should make a specific and conscious judgment as to whether or not immediate reporting attention should be given to the incident. If Mr. Greenwood or I am available, then the NRC telephoning should be referred to us, but if not, the Duty & Call Superintendent should carry out the telephoning.

On weekdays the incident happening and information should be immediately wheeled to Mr. Greenwood who will handle the reporting.

For the purposes of definition, "immediate reporting" has come to mean (post-TMI) one hour or less, but the more serious the incident (like a LOCA), the more rapid should be in incident reporting, naturally.



Glenn A. Reed

Copies to Messrs. Sol Burstein
C. W. Fay
D. K. Porter
G. A. Reed/11.1.1, 11.5.5