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10CFR50.4

10CFR50.90

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Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 156
MODIFICATIONS TO TECHNICAL SPECIFICATIONS
SECTION 15.3.7, SECTION 15.4.6, AND TABLE 15.4.1-2
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 50.90, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2, respectively, to incorporate changes to the plant Technical Specifications. The proposed changes add operating conditions, Limiting Conditions for Operation (LCOs), and surveillances for the 120 VAC vital instrument bus system and the diesel fuel oil system. This change also proposes a surveillance for the diesel generator room exhaust fans and a revision to eliminate the diesel generator daily testing requirement when one diesel generator is inoperable. The basis for Section 15.3.7 is also being revised to support the above changes and also to remove an administrative error. Marked-up Technical Specifications pages, a safety evaluation, and the no significant hazards consideration are enclosed.

DESCRIPTION OF CURRENT LICENSE CONDITION

Section 15.3.7, "Auxiliary Electrical Systems," describes the conditions of electrical power availability necessary to provide for safe reactor operation and provide for the continuing availability of engineered safety features.

Table 15.4.1-2, "Minimum Frequencies for Equipment and Sampling Tests," describes the surveillances and tests to be performed on various equipment throughout the plant.

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Section 15.4.6, "Emergency Power System Periodic Tests," describes the periodic tests and surveillances necessary to verify that the emergency power system will respond promptly and properly when required.

DESCRIPTION OF PROPOSED CHANGES

This Technical Specification Change Request proposes to modify Section 15.3.7, Section 15.4.6, and Table 15.4.1-2 to incorporate items identified during a comparison of the accident analyses in the Point Beach Nuclear Plant Final Safety Analysis Report (FSAR) and the Limiting Conditions for Operation (LCO) and surveillance sections of the current Point Beach Technical Specifications. The items being added are for systems or equipment required by the accident analyses, but are not currently included in the Point Beach Technical Specifications. In addition, this change request proposes a change to the diesel generator testing requirements by eliminating the daily testing requirement when one diesel generator is inoperable. Limiting the amount of testing for the diesel generators follows recent NRC guidance and will reduce diesel wear caused by excessive testing. The proposed changes are as follows:

1. An addition to Specification 15.3.7.A.1 concerning the diesel fuel oil system and 120 VAC vital instrument buses is as follows:

"Under normal conditions neither one nor both reactors shall be made critical unless the following conditions are met:

- f. Both diesel generators are operable, and:

- 1) The fuel oil supply system associated with each diesel generator is operable;
- 2) A fuel supply of 11,000 gallons is available;

- i. 120 VAC Vital Instrument Buses Y01, Y02, Y03, Y04, Y101, Y102, Y103, and Y104 for the unit(s) to be taken critical are energized from either their normal or alternate inverters."

2. An addition to Specification 15.3.7.A.2 concerning the diesel fuel oil system and 120 VAC vital instrument buses is as follows:

"Under abnormal conditions one reactor may be made critical providing the following conditions are met:

- g. Both diesel generators are operable, and:
 - 1) The fuel oil supply system associated with each diesel generator is operable;
 - 2) A fuel supply of 11,000 gallons is available;
 - j. 120 VAC Vital Instrument Buses Y01, Y02, Y03, Y04, Y101, Y102, Y103, and Y104 for the unit to be taken critical are energized from either their normal or alternate inverters."
3. In order to reduce the amount of wear imposed on the diesel generators during testing while following the guidance in NUREG-1366, "Improvements to Technical Specification Surveillance Requirements," the elimination of the daily testing requirement in Specification 15.3.7.B.1 is proposed. A provision for allowing one fuel oil transfer pump to be inoperable for up to four hours and the addition of a specification concerning instrument bus power is also proposed. The proposed changes are as follows:
- "During power operation of one or both reactors, the requirements of 15.3.7.A.1 may be modified to allow the following arrangements of systems and components:
- g. One diesel generator may be inoperable for a period not exceeding 7 days provided the other diesel generator is load tested to each unit within 24 hours to ensure operability. The engineered safety features associated with this diesel generator shall be operable and have been tested within the required surveillance test intervals. This LCO shall not be allowed in conjunction with e. or f. above.
 - h. One of the two fuel oil transfer pumps, its associated piping, and valves may be out of service for up to 4 hours. If after 4 hours the fuel oil transfer pump is not returned to service, the associated diesel generator shall be declared inoperable and the 7 day LCO shall be entered.
 - j. If one inverter is rendered inoperable and the associated loads transfer to a non-inverter power source, the loads shall be transferred back to an operable inverter within 8 hours or be in hot shutdown within an additional 6 hours and cold shutdown within an additional 36 hours."

4. To support the above changes to the diesel generator related sections of Specification 15.3.7, changes to the text of the associated basis is proposed as follows:

"The operability of the fuel oil system is determined by the ability to transfer fuel oil from the emergency fuel oil tank, through the diesel generator day tank, to the engine-mounted fuel tank. The 11,000 gallon supply in the emergency fuel tank provides sufficient fuel to operate one diesel generator at design load for more than 48 hours. One of the two fuel oil transfer pumps and its associated piping and valves is allowed to be out of service for 4 hours due to a combined 5 hour supply of fuel oil in the diesel base and day tanks which do not require a fuel oil transfer pump for flow to the associated diesel generator. In addition, it is normal for Point Beach to keep one, or the equivalent of one, bulk fuel oil storage tank full at all times (60,000 gallons which is equal to about 12 days supply at 205 gph). The operability of the diesel generator room exhaust fans is determined by the ability of the fans to automatically start when required and exhaust air from the diesel room."

The design descriptions of the diesel generators and gas turbine generator have been removed from the basis because this information is better suited for and is more thorough in the Point Beach FSAR.

5. To verify that the 120 VAC vital instrument buses are energized in the required manner, an additional surveillance and note are proposed to Table 15.4.1-2 as follows:

	<u>Test</u>	<u>Frequency</u>
"28. 120 VAC Vital Instr. Bus Power	Verify Energized*	Shiftly

* The specified buses shall be determined energized in the required manner at least once per shift by verifying correct static transfer switch alignment and indicated voltage on the buses."

6. A specification to verify the operability of the diesel fuel oil system, which includes running the fuel oil transfer pumps, on a monthly frequency is proposed as a change to Specification 15.4.6.A.4:

"Operability of the diesel fuel oil system shall be verified monthly."

7. A specification to verify the operability of the diesel generator room exhaust fans on a monthly frequency is proposed for addition as Specification 15.4.6.A.5:

"Operability of the diesel generator room exhaust fans shall be verified monthly."

8. A specification to test new fuel oil and stored fuel oil on a quarterly frequency is proposed for addition as Specification 15.4.6.A.6:

"A diesel fuel oil testing program shall be maintained to test both new fuel oil upon receipt and stored fuel oil in the emergency fuel oil tank on a quarterly frequency in accordance with applicable ASTM Standards."

BASIS AND JUSTIFICATION

In a letter submitted to the NRC on December 3, 1991, Wisconsin Electric Power Company committed to conduct a review of the accident analyses in the Point Beach Nuclear Plant Final Safety Analysis Report (FSAR) against the Limiting Conditions for Operation (LCO) section and the surveillance section of the Point Beach Nuclear Plant Technical Specifications. The review was conducted to determine if any systems, components, or functions taken credit for in the accident analyses should be added to the Technical Specifications. This review identified numerous items that should possess Technical Specification LCOs and surveillances. This change request includes items identified in the above review.

In addition to items identified in the review of the FSAR, this change also proposes a revision to the testing requirements of the emergency diesel generators. This revision is in accordance with the guidance contained in NUREG-1366, "Improvements to Technical Specifications Surveillance Requirements," and is intended to reduce the amount of wear induced in the diesel generators through excessive testing.

This is the final change request associated with the above review. All additions recommended by the review which were physically possible to implement have now been submitted. The justification for the additions included in the "Description of Proposed Changes" section of this letter is located in the attached safety evaluation.

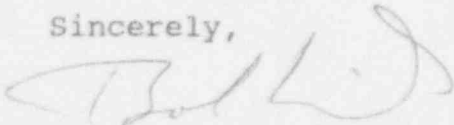
We have determined that the proposed amendments do not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in individual or cumulative occupational

exposure. Therefore, we conclude that the proposed amendments meet the requirements of 10 CFR 51.22(c)(9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

In summary, the proposed changes contained in this package will put additional controls in place that will further enhance and ensure the continued safe operation of Point Beach Nuclear Plant. For this reason, we request that you process this change at your earliest opportunity.

Please contact us if you have any questions.

Sincerely,




Bob Link
Vice President
Nuclear Power

DAW/jg

Enclosures

cc: NRC Regional Administrator
NRC Resident Inspector
Public Service Commission of Wisconsin

Subscribed and sworn before me on
this 26 day of February 1993.



Notary Public, State of Wisconsin

My commission expires 10-27-96.