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VPNPD-93-053
NRC-93-030

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U.S. NUCLEAR REGULATORY COMMISSION
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Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 162
MODIFICATIONS TO TECHNICAL SPECIFICATION
SECTION 15.1.3.A.3, "COMPONENTS REQUIRED FOR
REDUNDANT DECAY HEAT REMOVAL CAPABILITY"
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 Power Plant, Units 1 and 2, respectively, to incorporate changes to the plant Technical Specifications. The proposed changes are required to clarify Technical Specification 15.3.1.A.3, "Components Required for Redundant Decay Heat Removal Capability." We committed to submit this proposed change request to you in a letter dated September 3, 1992, in response to a Notice of Violation received from the Nuclear Regulatory Commission on August 4, 1992. Marked-up Technical Specification pages, a safety evaluation, and a no significant hazards consideration are enclosed.

DESCRIPTION OF CURRENT LICENSE CONDITION

Technical Specification 15.3.1, "Reactor Coolant System," details limiting conditions for operation for the reactor coolant system. Specifically, Technical Specification 15.3.1.A.3, "Components Required for Redundant Decay Heat Removal Capability," details limiting conditions for operational components required to assure redundant and diverse decay heat removal capability with a subcritical reactor with reactor coolant temperature less than 350°F. The specifications detail the requirements for operability

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of the reactor coolant loops and residual heat removal loops under these conditions, including relaxations, in order to ensure redundant and diverse decay heat removal capability for the decay heat being produced by the shutdown reactor core.

BACKGROUND INFORMATION

As previously stated, a letter from Mr. A. Bert Davis dated August 4, 1992, forwarded to Wisconsin Electric Power Company, licensee for Point Beach Nuclear Plant, cited a Notice of Violation and proposed imposition of civil penalties (Notice). The Notice described violations identified during a special safety inspection conducted at Point Beach Nuclear Plant from May 27 to June 14, 1992. The violations identified in the Notice pertained in one case to the activities resulting in an excess cooldown of the reactor coolant system, and in another case, resulted in the required decay heat removal system being removed from operation.

In our response to the Notice, dated September 3, 1992, (VPNPD-92-297/NRC-92-101; R. E. Link to Director, Office of Enforcement) we addressed in detail the corrective actions taken to date and proposed corrective actions in order to address the violations and to prevent recurrence. In response to both violations, we stated that a revision to Technical Specification 15.3.1.A.3 was warranted. Specifically, the revision would address the current requirement for residual heat removal (RHR) system flow at all times when the reactor coolant system (RCS) temperature is greater than 140°F, or when the RCS temperature is less than 350°F with no reactor coolant pumps operating. We also stated that the revision would clarify the "test" exception specified in Technical Specification 15.3.1.A.3.a.(3).

Research of the PBNP Licensing Basis revealed that Technical Specification Section 15.3.1.a.3 was not a part of the original plant technical specifications. The genesis of the issue which subsequently lead to the issuance of this specification was an April 19, 1980, loss of decay heat removal (DHR) capability incident at Davis-Besse Unit 1. This incident lead to the issuance of NRC IE Information Notice 80-20, dated May 8, 1980, and NRC IE Bulletin 80-12, transmitted to Wisconsin Electric Power Company on May 12, 1980. WE responded to the bulletin by letter dated June 5, 1980, outlining procedural changes and administrative controls implemented. Subsequently, the NRC transmitted a request to licensees of all PWRs on June 11, 1980, that they amend the Technical Specifications for their facilities to ensure redundancy of DHR capability in all modes of operation. This request attached sample, model Technical Specifications. WE responded to this

request by letter dated October 14, 1980. The NRC staff transmitted their review of this submittal on August 14, 1981, requesting resubmittal. WE responded to the requested resubmittal by letter dated November 16, 1981, as modified on May 3, 1982. Technical Specification 15.3.1.A.3 was ultimately issued as documented in the NRC Safety Evaluation Report (SER) dated November 8, 1992, which transmitted Amendment No. 66 to DPR-24 and Amendment No. 71 to DPR-27.

The intent of IE Bulletin 80-12 and the subsequent June 11, 1980, NRC letter was to improve nuclear plant safety by reducing the likelihood of the loss of DHR capability. This was done by requiring changes to the licensing basis which would stipulate that redundant or diverse means of DHR are available during all modes of operation.

DESCRIPTION OF PROPOSED CHANGES

This Technical Specification Change Request proposes to modify present Technical Specification 15.3.1.A.3.a.(3) by clarifying the exception for when one decay heat removal method must be in operation. We also propose to renumber this specification as 15.3.1.A.3.a.(4). The modification deletes a portion of the existing specification which presently reads:

> "At least one of the above decay heat removal methods shall be in operation except when required to be secured for testing."
>
> (The decay heat removal methods to which this specification is referring are listed in Technical Specification 15.3.1.A.3.a.(1); essentially, reactor coolant Loop A or B, their associated steam generator, and either reactor coolant pump and residual heat removal Loop A or B; a total of 4 DHR methods.)

The proposed wording will read:

> "At least one of the above decay heat removal methods shall be in operation."
>
> A. All reactor coolant pumps and residual heat removal pumps may be deenergized for up to 1 hour in an 8 hour period provided:

1) No operations are permitted that would cause dilution of the reactor coolant system boron concentration.

2) Core outlet temperature is maintained at least 10°F below saturation temperature.

This change will remove the ambiguous wording "...except when required to be secured for testing." and replaces it with more succinct and objective requirements which are consistent with the model Technical Specifications included in the June 11, 1980, NRC letter. It should also be noted that the NRC model Technical Specifications are the same words as those appearing in the Westinghouse Standard Technical Specifications (NUREG-0452, Revision 4). Additionally, the new wording is consistent with the requirements stipulated in Technical Specification 15.3.1.A.1.b.(1) which outlines the requirements for securing both reactor coolant pumps when the reactor is subcritical and the average reactor coolant temperature is greater than 350°F.

We have also placed an additional restriction on the 1 hour period, identified in the proposed wording, by stating that all pumps may be deenergized for up to 1 hour "in any eight hour period." This restriction (which is consistent with Technical Specification 15.3.8.4, which allows the securing of the operating RHR loop for 1 hour in any 8 hour period during refueling operations) provides more concise guidance regarding how often the exception may be utilized. We have also changed the order of Items 3 and 4 of Technical Specification 15.3.1.A.3.a in order to achieve better "readability" of the specifications.

We believe these changes will add the consistency and clarity to our specifications, consistent with NRC and Standard Technical Specification Guidance, which will prevent confusion or interpretive differences of the specifications by our PBNP operators and staff in the future.

Additionally, wording has been added to the basis for this Technical Specification section (partly transcribed from Westinghouse STS) which provides additional clarification for Technical Specification 15.3.1.A.3.a.(3) and Technical Specification 15.3.1.A.1.b which stipulate that either a reactor coolant pump or residual heat removal pump must be in operation when the reactor is subcritical and temperature is greater than 140°F.

BASIS AND JUSTIFICATION

The proposed changes will clarify and make the existing PBNP specifications more consistent relative to redundant decay heat removal capability. The changes proposed are consistent with NRC guidance and Westinghouse Standard Technical Specifications.

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 effluent release, or result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, we conclude that the proposed amendments meet the categorical exclusion requirements of 10 CFR 51.22(c)(9) and that an environmental impact appraisal need not be prepared.

Please contact us if you require additional information.

Sincerely,

Bob Link
Vice President
Nuclear Power

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Enclosures

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

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

Jacqueline Moretti
Notary Public, State of Wisconsin

My commission expires 10-27-96.