



**Wisconsin  
Electric**  
POWER COMPANY

231 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201

(414) 221-2345

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March 4, 1993

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
MODIFICATION TO TECHNICAL SPECIFICATION CHANGE REQUEST 149  
MAIN STEAM SYSTEM VALVE TESTING AND OPERABILITY  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated February 21, 1992, as modified April 16, 1992, Wisconsin Electric Power Company, Licensee for Point Beach Nuclear Plant, Units 1 and 2, requested amendments to Facility Operating Licenses DPR-24 and DPR-27, respectively. The proposed amendments would incorporate and clarify limiting conditions for operation (LCOs) and surveillance requirements for the main steam stop valves (MSSVs) and main steam non-return check valves (NRCVs) in our Technical Specifications. Upon review of our application as modified, we have concluded that additional clarification is required.

Proposed Specification 15.3.4.D would allow power operation to continue for up to four hours with an inoperable MSSV or NRCV. If the valve is not returned to an operable status within that time, then the affected unit must be placed in hot shutdown within the next six hours. As initially proposed, operation in hot shutdown would be allowed to continue provided the inoperable valve remains closed. However, an inoperable valve may be opened for testing.

Modifications were performed on the Unit 1 MSSVs during the spring 1992 maintenance and refueling outage. Post-modification testing with the main steam system and valves cold, indicated the valves were operable. During the subsequent start-up, with the main steam system at normal operating temperatures, testing was again performed. One valve failed to cycle completely closed. A decision was made to shut down and cool down the unit to troubleshoot and affect repairs. We determined that under the specification as proposed, repairs would be delayed if an inoperable valve could not be opened during the cooldown.

If an inoperable valve remains closed during the unit cooldown, additional time will be required for the valve to cool sufficiently for work to be performed. Heat will be dissipated from the valve

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ADD 1

March 4, 1993

Page 2

body and internals, in this instance, through heat losses to ambient. If steam is passed through the valve during the cooldown of the unit, the steam cools the valve body and internals, thereby shortening the period of time until the valve is sufficiently cool to allow troubleshooting and repair.

Therefore, we request the last sentence of proposed Specification 15.3.4.D be modified to state, "An inoperable main steam stop valve or non-return check valve may, however, be opened in the hot shutdown condition to cool down the affected unit and to perform testing to confirm operability." A Technical Specification page with the proposed specification, as modified by this submittal, is attached.

The Standard Technical Specifications (STS) for Westinghouse reactors, NUREG-1431, Revision 0, requires placing a reactor in hot shutdown ( $350^{\circ}\text{F} \geq T_{\text{avg}} \geq 200^{\circ}\text{F}$ ) if an inoperable MSSV cannot be shut and allows continued operation in this mode with the MSIV open. In this mode of operation, cooling to the reactor core is normally provided by the residual heat removal system. The energy available for release from a steam generator is low. The proposed PBNP Specification will allow opening of an MSSV or NRCV when shutdown with  $T_{\text{avg}} \geq 200^{\circ}\text{F}$  for testing and to facilitate cooldown. This is consistent with the action requirements of the STS.

We have reviewed the no significant hazards determination included as Attachment 1 to our February 21, 1992, submittal and have concluded that the determination of no significant hazards is applicable to our proposed amendment as modified April 16, 1992 and by this letter.

If you have any question or desire additional information, please contact us.

Sincerely,

*R. B. Newton for REL*

Bob Link  
Vice President  
Nuclear Power

TGM/jg

Attachment

Subscribed and sworn to before me  
this 4<sup>th</sup> day of March, 1993.

*Jacqueline Gorski*  
Notary Public, State of Wisconsin

My commission expires 10-27-96.

cc: NRC Regional Administrator, RIII  
NRC Resident Inspector  
Mr. L. L. Smith, PSCW