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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 159
IMPLEMENTATION OF INSERVICE TEST PROGRAM REQUIREMENTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.59 and 50.90, Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Units 1 and 2, respectively. The purpose of the requested amendments is to change the test intervals for the safety injection, residual heat removal and containment spray pumps and related systems from the present monthly requirement to quarterly in accordance with the Inservice Test Program. The Inservice Test Program is established in conformance to Section XI of the ASME Boiler and Pressure Vessel Code.

The general considerations for Technical Specification surveillance requirements are defined in Specification Section 15.4, "Surveillance Requirements." We are proposing changes to this section consistent with the Westinghouse Standard Technical Specifications (STS). These changes provide an improved basis for interpretation of individual surveillance requirements and equipment operability, and provide a stronger link between the surveillances and the limiting conditions for operation (LCOs) in Specification Section 15.3, "Limiting Conditions for Operation."

We are also proposing changes to Specification 15.4.2.B, "Inservice Inspection of Safety Class Components Other than Steam Generator Tubes." An addition has been made which implements the requirements for the Inservice Test Program. These conditions are consistent with the STS. Other changes have been made to the Technical Specifications to change the surveillance frequency for certain pumps and valves from monthly to quarterly in accordance with the Inservice Test Program.

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A description of each of the proposed changes and Technical Specification pages with the proposed revisions incorporated are included as attachments to this letter. The safety evaluation supporting these changes and the determination of no significant hazards are also attached.

These proposed amendments do not result in a significant hazards consideration and will not result in a change in the types or increase in the amounts of any effluents released off-site or an increase in individual or cumulative occupational radiation exposure. Therefore, the categorical exclusion criteria of 10 CFR 51.22 (c) (9) are met. An environmental review is not required.

The proposed amendments will significantly reduce the man-hour burden on plant personnel by extending the present monthly test interval for Emergency Core Cooling and Containment Spray Systems to quarterly. Presently, each monthly test cycle requires approximately 35 man-hours to complete. This does not include the administrative and engineering time necessary to schedule, review, and analyze the tests. Since the testing requires the removal of the associated system train from service, the reduced testing interval also results in an overall increase in train availability.

We request that this request be processed expeditiously. If you have any questions, please contact us.

Sincerely,

for

Bob Link
Vice President
Nuclear Power

TGM/jg

cc: NRC Resident Inspector
NRC Regional Administrator, Region III

Subscribed and sworn before me
this 29th day of September, 1993.

Jacqueline Loesch
Notary Public, State of Wisconsin

My commission expires 10-27-96.

Summary of Changes
Technical Specification Change Request 159
Implementation of Inservice Test Program Requirements
Point Beach Nuclear Plant, Units 1 and 2

The following is a summary of the proposed changes to the Point Beach Nuclear Plant (PBNP) Technical Specifications (TS). The purpose of these changes is to clearly define the link between the system and component Limiting Conditions for Operation (LCOs) and surveillances. Surveillance frequencies for pumps and valves will be changed from the presently defined interval (monthly) to in accordance with the Inservice Test Program (IST) requirements.

Technical Specification Section 15.4, "Surveillance Requirements"

This section has been completely rewritten to more clearly define the link between the LCOs and surveillances, when the surveillances are required to be performed, and permissible exceptions.

Condition/ Requirement	Description of Changes
15.4.0.1	This new specification defines the link between the system or component surveillance requirement and the applicable LCO. This is consistent with the Standardized Technical Specifications (STS) for Westinghouse reactors.
15.4.0.2	This Specification allows the extension of a surveillance interval by up to 25%. This requirement presently exists in Technical Specification Section 15.4, "Surveillance Requirements." The Specification is also consistent with the STS.
15.4.0.3	This new specification which allows 24 hours to perform a missed surveillance that is outside the 25% extended interval. This recognizes that the most likely outcome of the surveillance is a determination that the equipment is operable. This is a relaxation from present TS requirements and is consistent with STS.
15.4.0.4	This is a new specification which prohibits entry into an operating condition if the required surveillances have not been performed. This is consistent with STS. A qualifier, consistent with the STS bases has been added to allow entry into an operating mode if it establishes conditions necessary to perform the surveillance based on a reasonable assurance of system or component operability.

Bases	Existing Specification 15.4 has been relocated to a new Bases for the TS Section 15.4. The statement qualifying the application of the 25% extension to the surveillance interval has been removed.

Technical Specification Section 15.4.2, "Inservice Inspection Of Safety Class Components"

Specification 15.4.2.B has been retitled "Inservice Inspection and Testing of Safety Class Components Other than Steam Generator Tubes." The applicability and objective statements have been modified to indicate the inclusion of inspection and testing requirements. Modifications to this section have been made to support a change from monthly operability testing of systems and components to quarterly testing in accordance with Section XI of the ASME Code.

Condition/ Requirement	Description of Changes
15.4.2.B	The title has been changed to "Inservice Inspection and Testing of Safety Class Components Other than Steam Generator Tubes."
15.4.2.B.1.a	A statement was added explaining the ASME Code requirements do not supersede any other Technical Specification requirement. This condition is consistent with the Standard Technical Specification provisions.
15.4.2.B.3	Added the requirement for Inservice Testing in accordance with the ASME Code. The provisions specified are consistent with the STS.
Bases	Added an explanation that describes the administrative nature of the requirements for implementation of the Inservice Inspection and Testing programs in accordance with the ASME Section XI Code.

Technical Specification Section 15.4.5, "Emergency Core Cooling System and Containment Cooling System Tests"

The following changes have been made to the Specifications in this section to support testing and surveillance in accordance with Section XI of the ASME Code. Subsections have been retitled "... Tests and Surveillances". Testing in accordance with the ASME Code requirements is consistent with the STS.

Condition/ Requirement	Description of Changes
15.4.5.II.A.1	The monthly test requirement for RHR, SI and CS pumps has been changed to require testing in accordance with the IST program.
15.4.5.II.A.2	The requirement for performing the surveillance test on the mini-flow line has been changed. The surveillance test will be performed using the full flow test lines. Testing using the full flow test lines provides added assurance of pump operability while eliminating the potential for pump degradation due to testing at reduced flow rates.
15.4.5.II.B (existing)	This section which defined refueling water storage tank, accumulator, spray additive and boric acid storage tank valve testing has been deleted. These valves are tested under the approved Inservice Test Program as required by 10 CFR 50.55a.
15.4.5.II.B.1 (new)	This is a new requirement to verify the containment sump suction is not blocked or otherwise degraded every refueling outage. This is done to ensure RHR system operability when operating in the containment sump recirculation mode. This is consistent with the STS.
15.4.5.II.B.2 (new)	This is a new requirement to perform a monthly verification of the system lineups of ECCS and containment cooling systems. This provides additional assurance between quarterly inservice tests that systems remain operable. This is consistent with the STS.
Bases	The reference to monthly testing has changed to indicate that testing of active components is performed in accordance with ASME Section XI requirements.

Safety Evaluation
Technical Specification Change Request 159
Implementation of Inservice Test Program Requirements
Point Beach Nuclear Plant, Units 1 and 2

The changes proposed by this amendment request will:

1. Implement requirements in Technical Specification Section 15.4, "Surveillance Requirements," which more clearly define the general considerations related to the application of equipment surveillance requirements and their relationship to equipment operability. The proposed requirements are consistent with the Westinghouse Standard Technical Specifications.

2. Implement the specific requirement for an Inservice Test Program in accordance with 10 CFR 50.55a (g). Appropriate surveillance frequencies defined in the Technical Specifications are changed from monthly to quarterly in accordance with the program requirements. These requirements are consistent with the Westinghouse Standard Technical Specifications.

The existing specifications located in Section 15.4 of the Technical Specifications provide the basis for the surveillance intervals defined in the Technical Specifications. This discussion has been relocated to the bases for Section 15.4 with the exception of the allowance for a surveillance interval to be extended up to 25%. This condition has been incorporated into new Specification 15.4.0.3.

The requirements specified in proposed Specifications 15.4.0.1 through 15.4.0.4 provide clear direction with respect to the performance of system and equipment surveillances and surveillance frequencies, and the relationship to equipment operability and Limiting Conditions for Operation (LCOs). These requirements provide consistency in the interpretation of the Technical Specification requirements. These conditions, with the exception of proposed Specification 15.4.0.3 are consistent with present interpretations and are therefore, not new requirements.

Specification 15.4.0.3 will allow up to 24 hours to perform a missed surveillance prior to declaring the associated system or component inoperable. This condition is consistent with the Westinghouse Standard Technical Specifications. As explained in the bases of the Standard Technical Specifications, this Specification recognizes that the most likely outcome of the missed surveillance is that the system or component remains operable. This is a relaxation of present requirements which provides a short period of time consistent with allowed equipment out of service times to show equipment operability.

Technical Specification Section 15.4.2.B has been retitled, "Inservice and Testing of Safety Class Components Other than Steam Generator Tubes." A specific requirement for the establishment of an Inservice Test Program in accordance with the provisions of 10 CFR 50.55a has been added. This requirement is also contained in the Westinghouse STS.

The requirement for the implementation of an Inservice Test Program is not a new requirement since the requirement is contained in existing regulations.

Provisions have been added to Specification 15.4.2.B.1 related to the Inservice Inspection program. These conditions specify that ASME Code requirements do not supersede the requirements of any Technical Specification. This ensures that conservative surveillance requirements are applied to demonstrate system and component operability.

Specification 15.4.2.B.3 has been added to specifically require the implementation of an Inservice Test Program consistent with 10 CFR 50.55a. This Specification is consistent with the Westinghouse Standard Technical Specifications. Since the program is required by existing NRC regulations, this specification does not constitute a new requirement or change in the operation of PBNP.

An addition to the bases for this section explains that the requirements for implementation of the Inservice Inspection and Testing programs are administrative requirements. Failure to meet Code requirements are to be evaluated on an individual basis to determine if systems or components are operable in accordance with the Code. If a system or component is determined to be inoperable the appropriate limiting condition for operation is entered.

The test frequency for the Safety Injection, Residual Heat Removal, and Containment Spray System pumps and valves has been changed from monthly to quarterly in accordance with the Inservice Test Program. We have reviewed the test data from the monthly tests back through the middle of 1978. There has been no indication of component degradation discovered during this testing. This indicates a high degree of reliability and performance which supports the increase in the surveillance interval. The quarterly surveillance interval meets the ASME Code Section XI requirements. This surveillance frequency provides adequate assurance of equipment operability.

The acceptance criteria specified in the Specifications for the SI, RHR and CS pumps has been modified to indicate the pumps are tested on the full-flow test line. Testing the pumps at full flow provides added assurance that accurate test results are obtained. Testing at full flow also eliminates concerns with potential pump degradation caused by running pumps at reduced flows.

The proposed changes add additional requirements not presently included in the Technical Specifications, and implement changes in the test frequency for Emergency Core Cooling System pumps and valves in support of the Inservice Test Program established in accordance with the requirements of 10 CFR 50.55a and ASME Code Section XI requirements which provide the appropriate assurance of system and component operability. The proposed changes ensure the continued safe and reliable operation of PBNP in accordance with approved standards.

No Significant Hazards Determination
Technical Specification Change Request 159
Implementation of Inservice Test Program Requirements
Point Beach Nuclear Plant, Units 1 and 2

As required by 10 CFR 50.91(a), we have evaluated the proposed changes and have determined that they do not result in a significant hazards consideration. Our analysis against each of the criteria in 10 CFR 50.92 follows.

1. The proposed amendments will not involve a significant increase in the probability or consequences of an accident previously evaluated.

   The addition of specific general considerations related to equipment surveillance requirements and their relationship to equipment operability are administrative in nature. They do not change the interpretation or intent of the Technical Specifications. These conditions are consistent with the Westinghouse Standard Technical Specifications (STS).

   The addition of the specific requirement for the Inservice Test Program to Section 15.4.2 of the Technical Specifications only reiterates the requirements of 10 CFR 50.55a(g). This requirement does not implement any new requirements on the operation or testing of equipment.

   The decrease in the number of equipment operational transients due to the increase in the surveillance interval for the Safety Injection System (SI), Residual Heat Removal (RHR) System, and Containment Spray (CS) System pumps and valves will result in an increase in system availability. Reduced testing is also expected to have a positive affect on overall equipment reliability since frequent testing results in increased wear and potential for equipment failure. Other actions including a monthly verification of system lineups for the SI, CS and RHR systems provides increased assurance of system operability between surveillance tests. The potential for equipment problems to go undetected for a longer period of time is small as indicated by equipment surveillance history.

   Therefore, these changes will not effect the probability or consequences of previously analyzed accidents.

2. The proposed amendments will not create the possibility of a new or different kind of accident from any accident previously analyzed.

   These changes only affect the equipment testing frequency. Equipment design, operation and the methods of testing will not be changed. Therefore, the proposed changes cannot create the possibility of a new or different kind of accident than any accident previously evaluated.

3. The proposed amendments will not involve a significant reduction in the margin of safety.

   The proposed changes which implement the requirements of 10 CFR 50.55a (g) and clarify the general considerations related to equipment surveillances are administrative in nature. They do

not change the intent of any existing license or other requirement.

The increase in equipment surveillance intervals will result in an improvement in equipment and system availability and reliability. Surveillance of equipment will be performed as required by the regulations and Section XI of the ASME Boiler and Pressure Vessel Code. These proposed changes will reduce the potential for equipment failures due to unnecessary testing.

Adequate assurance is provided by testing in accordance with the ASME Code requirements and periodic verification of system lineups to ensure that the affected systems remain operable and capable of performing their design function. Therefore, a reduction in a margin of safety will not occur.