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10 CFR 50.4
10 CFR 50.90

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U.S. NUCLEAR REGULATORY COMMISSION
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Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 169
MODIFICATIONS TO TECHNICAL SPECIFICATION 15.3.3
"EMERGENCY CORE COOLING SYSTEM, AUXILIARY COOLING SYSTEMS, AIR RECIRCULATION FAN COOLERS, AND CONTAINMENT SPRAY"
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 will modify Technical Specification 15.3.3, "Emergency Core Cooling System, Auxiliary Cooling Systems, Air Recirculation Fan Coolers, and Containment Spray" to incorporate allowed outage times similar to those contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications," and clarify the operability requirements for the service water pumps. Proposed changes are also included to clarify the completion times for placing a unit in hot or cold shutdown if a limiting condition for operation cannot be met. Marked-up Technical Specification pages, a safety evaluation, and the no significant hazards consideration are enclosed.

DESCRIPTION OF CURRENT LICENSE CONDITION

Technical Specification Section 15.3.3, "Emergency Core Cooling System, Auxiliary Cooling Systems, Air Recirculation Fan Coolers, and Containment Spray," defines the limiting conditions for operation that are necessary to remove decay heat from the core

A001

in normal or emergency situations, remove heat from the containment in normal and emergency situations, and remove airborne iodine from the containment atmosphere following a postulated design basis accident.

DESCRIPTION OF PROPOSED CHANGES

This Technical Specification change request proposes to modify TS 15.3.3 by incorporating allowed outage times (AOTs) similar to those contained in NUREG 1431, Revision 0. This change request also proposes to clarify the operability requirements for the service water pumps and the completion times for placing a unit in hot or cold shutdown if a limiting condition for operation cannot be met. The proposed changes are as follows:

1. The AOTs for the safety injection (SI) pumps and valves in the SI system required to function during accident conditions are being changed from 24 hours to 72 hours.

2. The AOTs for the residual heat removal (RHR) pumps and valves in the RHR system required to function during accident conditions are being changed from 24 hours to 72 hours. The AOT for the RHR heat exchangers is being changed from 48 hours to 72 hours.

3. The AOT for the containment spray (CS) pumps is being changed from 48 hours to 72 hours. The AOT for valves in the CS system required to function during accident conditions is being changed from 24 hours to 72 hours. The exception listed in Specification 15.3.3.B.2.c is being deleted as it will no longer apply when the AOTs for the CS pumps and valves are the same.

4. The operability requirements for the service water (SW) system are being clarified to state that four SW pumps are required, "two from each train."

5. Specifications 15.3.3.A.2, B.2, and D.2 are being clarified to state that if the LCOs cannot be met within the time specified, the reactor will be placed in hot shutdown "within six hours and in cold shutdown within 36 hours." Specification 15.3.3.A.3 is being clarified to state that if the LCOs cannot be met within the time specified, the reactor will be placed in hot shutdown "within six hours."

6. The Basis section is being changed to:

- delete the statement referring to completing repairs to the SI system within 48 hours of reaching hot shutdown,
- clarify the requirement for valves that "provide the duplicate function" for the specific case of the containment spray pump discharge valves,
- state that two SW pumps, vice three, are required during the injection and recirculation phases of a postulated loss-of-coolant accident (LOCA) in one unit together with a hot shutdown or normal operation condition in the other unit, and
- state that, of the four service water pumps required to be operable, two must be powered from the 'A' train and two from the 'B' train.

BASIS AND JUSTIFICATION

This Technical Specification change request is being submitted to change the allowed outage times for the safety injection, residual heat removal, and containment spray pumps and valves, and residual heat removal heat exchangers to 72 hours. This Technical Specification change request also clarifies the operability requirements for the service water pumps and the completion times for placing a unit in hot or cold shutdown if a limiting condition for operation cannot be met. The proposed changes will allow more time to perform corrective maintenance on these components, if required, and avoid potential transients and challenges to safety systems associated with a required shutdown of the unit without the specific safety related equipment operable. The proposed changes are consistent with the Westinghouse Improved Standard Technical Specifications, NUREG 1431, Revision 0. Plant specific analysis demonstrates the changes do not pose an undue risk to the health and safety of the public or plant personnel. Approval of these changes will ensure and enhance the continued safe operation of Point Beach Nuclear Plant.

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 released, 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 have any questions.

Sincerely,

Bob Link
Vice President
Nuclear Power

KVA/jg

Enclosure

cc: NRC Resident Inspector
NRC Regional Administrator

Subscribed and sworn before me on
this 12th day of September 1994.

Jacqueline Moucha
Notary Public, State of Wisconsin

My commission expires 10-27-96.

TECHNICAL SPECIFICATION CHANGE REQUEST 169
SAFETY EVALUATION

INTRODUCTION

Wisconsin Electric Power Company (Licensee) is applying for amendments to Facility Operating License DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. The requested amendments propose changes to Technical Specification (TS) 15.3.3, "Emergency Core Cooling System, Auxiliary Cooling Systems, Air Recirculation Fan Coolers, and Containment Spray," and its associated bases, to incorporate allowed outage times similar to those contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications," and clarify the operability requirements for the service water pumps.

EVALUATION

This Technical Specification change request is being submitted to change the allowed outage times for safety injection, residual heat removal, and containment spray pumps and valves, and residual heat removal heat exchangers to 72 hours. This change will allow more time to perform corrective maintenance on these components, if required, and avoid potential transients and challenges to safety systems associated with a required shutdown of the unit without the specific safety related equipment operable.

No new failure modes, accident initiators, or intersystem dependencies are created by extending the allowed out of service time for this equipment. Should one of these components become unavailable, procedural controls are in place which would subsequently restrict other Technical Specification required equipment from being taken out of service. This guidance is contained in Nuclear Procedure (NP) 10.1.1 "Voluntary Entry into an Limiting Condition for Operation (LCO)".

We consider this change acceptable on the basis that the risks associated with a plant shutdown transient with an inoperable safety system are greater than the risks associated with extending the current allowed out of service time for that safety system from 24 or 48 hours to 72 hours. The risks associated with extending the allowed out of service times are commensurate with those evaluated in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications."

The plant specific impact of extending the allowed outage times was also evaluated using our Individual Plant Examination (IPE) methodology. The effect of the specific safety system unavailability is summarized in the following table.

CASE	ANNUAL CDF	DAILY DELTA CDF
BASE CASE	8.709E-5	N/A
SAFETY INJECTION	1.141E-4	9.003E-8
RESIDUAL HEAT REMOVAL	1.690E-4	2.730E-7
CONTAINMENT SPRAY	NOT APPLICABLE	NOT APPLICABLE

The table illustrates the comparison between a base case, with all the safety systems operable, and system specific cases, with the equipment out of service under the proposed allowed outage times.

The base case in the table represents a baseline annual core damage frequency with no out-of-service time for testing or maintenance of the respective systems. This number is based on a 300-day operating year. The specific system cases illustrate the impact on the baseline annual core damage frequency if one train of the safety system was out of service. The second column for each specific system case lists the annual core damage frequency if the indicated safety system wa out of service for the entire year. The third column lists the incremental increase in core damage frequency over the baseline case on a daily basis. In other words, this is the incremental increase in core damage frequency if the specific system is out of service for one day.

The containment spray system has no effect on core damage frequency for the Point Beach IPE. The primary function of containment spray is the protection of the containment. There is sufficient redundancy in containment fan coolers to prevent over-pressurization of the containment. Thus, extending the allowed out-of-service time for containment spray will not affect containment operability.

This plant specific analysis demonstrates an acceptable level of risk in extending the allowed out of service time from 24 or 48 hours to 72 hours. The core damage frequency numbers do not account for unquantified factors such as the additional precautionary measures that would be taken when safety system operability was degraded.

Additional changes to the servic water system specification and basis address train specific power for the service water pumps. Of the six service water pumps, three are powered from each train. The proposed clarification is that, of the four service water pumps required to be operable, two must be powered from each train. The basis which now states that three service water pumps are required during the injection and recirculation phases

of an accident is being changed to clarify that two service water pumps are required. Calculation N-90-006, Rev 1, has been performed which demonstrates that two service water pumps are adequate to supply accident loads in one unit and hot shutdown/ normal operation loads in the other unit.

The completion times for placing a unit in hot or cold shutdown if a limiting condition for operability cannot be met are consistent with those proposed in Technical Specification Change Request 164, dated January 26, 1994. That submittal contains the safety evaluation and no significant hazards determination for these completion times. The completion times in the Component Cooling Water section, 15.3.3.C, are not being changed as the ability to achieve cold shutdown in 36 hours with only one train of CCW is not within our design basis. Hence, the wording in this section will remain as is.

CONCLUSIONS

In summary, the proposed changes to the Technical Specifications will allow the timely return to service of safety related equipment without subjecting the plant to the transient and challenge to safety systems associated with the shutdown of a unit. The proposed changes are consistent with the Westinghouse Improved Standard Technical Specifications, NUREG 1431, Revision 0. Plant specific analysis demonstrates the changes do not pose an undue risk to the health and safety of the public or plant personnel. Approval of these changes will ensure and enhance the continued safe operation of Point Beach Nuclear Plant.

TECHNICAL SPECIFICATION CHANGE REQUEST 169
"NO SIGNIFICANT HAZARDS CONSIDERATION"

In accordance with the requirements of 10 CFR 50.91(a), Wisconsin Electric Power Company (Licensee) has evaluated the proposed changes against the standards of 10 CFR 50.92 and has determined that the operation of Point Beach Nuclear Plant, Units 1 and 2, in accordance with the proposed amendments, does not present a significant hazards consideration.

A proposed facility operating license amendment does not present a significant hazards consideration if operation of the facility in accordance with the proposed amendment will not:

1. Create a significant increase in the probability or consequences of an accident previously evaluated; or

2. Create the possibility of a new or different kind of accident from any accident previously evaluated; or

3. Will not create a significant reduction in a margin of safety.

CRITERION 1

Operation of this facility under the proposed Technical Specifications change will not create a significant increase in the probability or consequences of an accident previously evaluated. The proposed changes to the allowed out-of-service times have no impact on the probability of an accident occurring. This equipment being out-of-service is not an initiator for any accident previously evaluated. There is no physical change to the facility, its systems or its operation.

The clarification of service water pump operability requirements will ensure redundant train capability to mitigate the consequences of an accident which has been previously evaluated. Extending the allowed out of service times for the safety injection, residual heat removal, and containment spray pumps and valves and residual heat removal heat exchangers does not create a significant increase in the consequences of an accident previously evaluated. The proposed changes are consistent with the Westinghouse Improved Standard Technical Specifications, NUREG 1431, Revision 0. Plant specific analysis demonstrates the proposed changes do not pose an undue risk and thus will not result in a significant increase in the consequences of an accident.

CRITERION 2

Operation of this facility under the proposed Technical Specifications change will not create the possibility of a new or different kind of accident from any accident previously evaluated. The safety injection, containment spray, and residual heat removal pumps and valves and residual heat removal heat exchangers are used to mitigate the consequences of an accident and are not normally in use during power operation. The availability of these components does not effect the possibility of a new or different type of accident. The service water pumps are normally in use during power operation. The proposed change will ensure that redundant train capability exists. Minimum service water pump requirements remain the same. The failure modes of the service water system remain unchanged. Therefore, extending the allowed out-of-service time does not create the possibility of a different type of accident than previously evaluated.

CRITERION 3

Operation of this facility under the proposed Technical Specifications change will not create a significant reduction in a margin of safety. The proposed Technical Specification changes revise the allowed outage times for the safety injection, residual heat removal, and containment spray pumps and valves and residual heat removal heat exchangers to 72 hours. This change will allow more time for corrective maintenance to be performed on these components, if required, and avoid potential transients and challenges to safety systems associated with a required shutdown of the unit without the specific safety related equipment operable. The proposed changes are consistent with the Westinghouse Improved Standard Technical Specifications, NUREG 1431, Revision 0. Plant specific analysis demonstrates the changes do not pose an undue risk and thus will not result in a significant reduction in a margin of safety. The clarification to the specification for service water pump operability may increase the margin of safety by ensuring that redundant train capability exists.