



**Wisconsin  
Electric**  
POWER COMPANY

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VPNPD-91-134  
NRC-91-053

10 CFR 50.59  
10 CFR 50.90  
10 CFR 50.4

April 24, 1991

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
TECHNICAL SPECIFICATION CHANGE REQUEST 144  
CONDENSATE STORAGE TANK LEVEL REQUIREMENTS  
POINT BEACH NUCLEAR PLANTS, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.59(c), 50.90, and 50.4, 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. The requested amendments consist of revisions to Technical Specification 15.3.4.A.3 and the associated basis. The proposed changes would increase the required minimum volume of water available in the Condensate Storage Tanks (CST's) from 10,000 to 13,000 gallons per unit and provide the basis for maintaining this minimum inventory. Marked-up Technical Specification pages with the proposed changes included are attached.

On April 17, 1989, we submitted our response to the station blackout rule, 10 CFR 50.63, "Loss of All Alternating Current Power." In that response, we maintained that the existing Technical Specification requirement of 10,000 gallons of water per unit in the CST's, along with the initial steam generator water inventory, was sufficient to maintain steam generator decay heat removal capability, using auxiliary feedwater during the one-hour period following a loss of all AC power necessary to align the alternate AC (AAC) source. Service water is available as a source of water to feed steam generators following restoration of power from the AAC source. A calculation was performed supporting our position and is maintained on file.

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A subsidiary of Wisconsin Energy Corporation

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In the NRC staff's Safety Evaluation Report (SER) dated October 3, 1990, addressing our conformance to the rule, the staff recommended that we increase the minimum water volume requirement for the CST's to 13,000 gallons per unit. This was based on the conclusion presented in the Technical Evaluation Report attached to the SER that the presently required 10,000 gallon limit may not be sufficient, considering other operator priorities at one hour after onset of a station blackout. This one-hour time frame is based on the time limit in the rule for having an AAC source available. While the 10,000 gallon requirement is technically adequate for accident analysis, we agree that increasing the required volume to 13,000 gallons per unit will afford operators additional time to take the necessary corrective action. We, therefore, are requesting a change to Technical Specification 15.3.4.A.3 to require a minimum CST water inventory of 13,000 gallons of water per unit. We have also proposed a change to the "Bases" for Technical Specification Section 15.3.4 to indicate this CST level is adequate to maintain a unit in hot shutdown condition for at least one hour following a loss of all AC power.

We have evaluated these proposed changes, in accordance with the requirements of 10 CFR 50.91(c), against the standards contained in 10 CFR 50.92 and have determined that operation of the Point Beach Nuclear Plant units in accordance with the proposed amendments does not result in a significant hazards consideration. Accidents evaluated for Point Beach Nuclear Plant considered in our determination of no significant hazards include Loss of All AC Power to the Auxiliaries, Loss of External Electrical Load, Loss of Normal Feedwater, Steam Generator Tube Rupture, and Small Break Loss of Coolant Accidents. Our evaluation against each of the criteria of 10 CFR 50.92 and basis for this conclusion follow:

#### Criterion 1

Operation of a facility in accordance with a proposed amendment will not present a significant hazards consideration if it does not involve a significant increase in the probability or consequences of an accident previously evaluated. The proposed change increases the required water inventory in the condensate storage tanks and provides the basis for the required inventory. The increased inventory provides the operator with additional time in which to take action in the event of a loss of all AC power and anytime there is a demand for auxiliary feedwater, including the

above-referenced accidents. Maintaining a greater water volume in the CST's also provides the capability to remove a greater total quantity of decay heat prior to additional operator action being required. Increasing the total quantity of decay heat energy that can be removed prior to operator response being required does not increase the probability of an accident previously evaluated and may decrease the overall accident consequences.

#### Criterion 2

Operation of a facility in accordance with a proposed amendment does not result in a significant hazards consideration if it cannot create the possibility of a new or different kind of accident from any previously evaluated. The required minimum inventory in the condensate storage tanks is increased. The corresponding basis is clarified to indicate this inventory is sufficient for at least one hour of operation in hot shutdown following a loss of all AC power. There is no change to the auxiliary feedwater system or its operation or other physical change to the facility and its operation. Therefore, a new or different kind of accident from any previously evaluated cannot result.

#### Criterion 3

Operation of a facility in accordance with a proposed amendment does not result in a significant hazards consideration if it does not result in a significant reduction in a margin of safety. By increasing the required water inventory in the condensate storage tanks, a margin of safety is increased. The operator has additional time to evaluate options and implement the preferred method to insure a continued source of auxiliary feedwater for decay heat removal, depending on the situation at hand. The operator also has additional time to respond to the accident before maintaining auxiliary feedwater becomes a pressing concern.

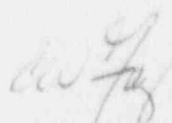
We, therefore, conclude that these proposed changes do not result in a significant hazards consideration.

We request that these amendments be issued by July 31, 1991.

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April 24, 1991  
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Please contact us if you have any questions concerning the proposed amendments or 10 CFR 50.91 evaluation.


Very truly yours,

  
C. W. Fay  
Vice President  
Nuclear Power

Attachments

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector

Subscribed and sworn to before me  
this 24<sup>th</sup> day of April, 1991.

  
Notary Public, State of Wisconsin

My Commission expires 5-22-94.