



Wisconsin Electric POWER COMPANY
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September 8, 1983

CERTIFIED MAIL

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. J. R. Miller, Chief
Operating Reactors, Branch 3

Gentlemen:

DOCKET NO. 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 92
COMPONENT COOLING HEAT EXCHANGER
POINT BEACH NUCLEAR PLANT, UNIT 2

In accordance with 10 CFR 50.59(c), Wisconsin Electric Power Company (Licensee) hereby requests an amendment to Facility Operating License DPR-27 for the Point Beach Nuclear Plant, Unit 2. The purpose of this amendment is to temporarily revise the Point Beach Unit 2 Technical Specification Limiting Condition for Operation for component cooling heat exchangers to permit performance of a special ten-year inspection and maintenance program. The details of this program together with the proposed specification revision are provided below.

In 1982 a tube leak was experienced in the "A" component cooling water heat exchanger at the Point Beach Nuclear Plant. The problem prompted the decision to inspect the component cooling water heat exchangers and conduct preventive maintenance as necessary. During the recently completed Unit 2 refueling outage, the "C" component cooling water heat exchanger was opened, cleaned, and the tubes were eddy current inspected. Only minor tube degradation was detected by eddy current in several peripheral tubes. One tube was plugged as a precautionary measure. In addition, because of general corrosion that was occurring both the channelhead and tubesheet were sandblasted. Crevice (corrosion of the tubesheet in the tube-to-tubesheet crevice) was then evident on the outlet tubesheet. As a result, both the channelheads and tubesheets were epoxy coated to ensure the service life of the component.

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Because of the leakage experienced in the "A" heat exchanger and the conditions found in the "C" heat exchanger we intend to perform the same inspections and preventive maintenance on the "A" and "B" component cooling water heater exchangers during the upcoming Unit 1 fall refueling outage. Technical Specification 15.3.3.C governs the limiting conditions for operation for the component cooling water system. If Unit 1 is shut down the "A" heat exchanger may be taken out of service for this inspection and maintenance indefinitely. However, the "B" heat exchanger is shared by both units and Specification 15.3.3.C.2.b allows one heat exchanger for an operating unit to be out of service for no more than 48 hours.

Forty-eight hours is not sufficient time to perform the cleaning, inspection, and repair that we believe, based on the experience with "C" heat exchanger, is necessary to maintain unit reliability. Our experience with the "C" heat exchanger indicates that fourteen days are sufficient to perform the work indicated below.

1. Hydro-lance and cleaning - two days.
2. Complete eddy current inspection - four days.
3. Sandblasting of channelheads - three days.
4. Application of epoxy coating - two days.
5. Proper curing of epoxy - four days.

We, therefore, are requesting in this application that a waiver to Specification 15.3.3.C.2.b be granted for the period of the Unit 1 refueling outage to permit the specified activities.

It is suggested that this waiver be documented by including the following footnote with Specification 15.3.3.C.2.b:

"During the Unit 1 fall 1983 refueling outage scheduled for October 1983 through March 1984, the "B" component cooling heat exchanger may be out of service for up to fourteen days while performing extended inspections and maintenance of this component."

You should note that at all times we would maintain the capability to suspend the inspection or maintenance, close up the heat exchanger, and return it to service within a twelve-hour period. This proposed waiver, therefore, represents a temporary administrative modification to the specification to avoid a technical violation of the specification when the consecutive out-of-service time exceeds 48 hours.

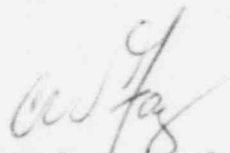
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In accordance with 10 CFR 50.91(a), Licensee is providing the following analysis regarding the determination of whether this amendment involves a significant hazards consideration. As discussed above, although the length of time to complete this inspection and repair is anticipated to take up to fourteen days, the component cooling water heat exchanger could be returned to service, if necessary, upon twelve hours notice. Since the existing specifications permit a component cooling water heat exchanger to be out of service for up to 48 hours, the proposed waiver effectively does not result in any increase in the probability or consequence of an accident, does not create the possibility of a new or different kind of accident, nor does it involve any reduction in a margin of safety.

In accordance with the schedule of amendment approval fees for reactor facility licenses as listed in 10 CFR Part 170.22, Licensee has determined that the amendment approval for this proposed change should be classified as a Class II approval. This classification is based on the determination that the proposed change is an administrative addition to the specifications to preclude a literal violation of a limiting condition for operation. Accordingly, we have enclosed herewith a check in the amount of \$1,200 for payment of this approval fee.

As further specified by the Commission's regulations, we have provided three signed originals and 40 copies of this amendment application. It is requested that this amendment be promptly noticed and issued as the Point Beach Unit 1 refueling outage is scheduled to commence on October 1, 1983. Please contact us if you have any questions concerning this request.

Very truly yours,



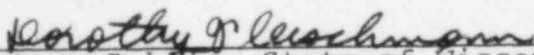
Vice President-Nuclear Power

C. W. Fay

Enclosure (Check No. 747369)

Copy to NRC Resident Inspector

Subscribed and sworn to before me
this 12th day of September 1983.


Notary Public, State of Wisconsin

My Commission expires July 1, 1984.