



**Wisconsin
Electric**
POWER COMPANY

Point Beach Nuclear Plant
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PBL 91-0248

October 14, 1991

Mr. John A. Zwolinski
Assistant Director for Region III Reactors
Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Stop OVTN-13H24
Washington, DC 20555

Dear Mr. Zwolinski:

DOCKET NO. 50-266
TEMPORARY WAIVER OF COMPLIANCE
NUCLEAR FLUX POWER RANGE, OVERTEMPERATURE AT,
OVERPOWER AT, PRESSURIZER PRESSURE AND POWER OPERATED
RELIEF VALVE OPERABILITY SURVEILLANCE REQUIREMENTS
POINT BEACH NUCLEAR PLANT, UNIT 1

This letter outlines Wisconsin Electric's request for a Temporary Waiver of Compliance which would allow deferral of the monthly surveillance testing associated with the nuclear flux power range (NFPR), overtemperature AT (OTAT), overpower AT (OPAT), pressurizer pressure reactor protection, and the power operated relief valve (PORV) operability. The basis for this request is outlined below.

WAIVER DESCRIPTION

Wisconsin Electric requests a Temporary Waiver of Compliance to defer the monthly surveillance tests associated with the PBNP Unit 1 NFPR, OTAT, OPAT, pressurizer pressure reactor protection and PORV operability as specified in Technical Specification 15.4.1, Table 15.4.1-1, Items 1, 4, 7 and 33, respectively.

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This temporary waiver will defer the monthly surveillance tests for 30 days from the date when the tests are currently due. Specifically, the next surveillance tests will be due on or before 2400 hours on November 12, 1991, for the NFPR channels, 2400 hours on November 17, 1991, for the remaining circuits.

CIRCUMSTANCES

Troubleshooting of nuclear instrumentation system (NIS) channel N44 output spikes indicates a likely detector problem. Unit 1 was scheduled to be taken out of service and shut down early on Sunday morning, October 13, 1991, to replace N44 power range detector.

Our schedule power reduction and shut down was initiated, then delayed and finally canceled because the Kewaunee Nuclear Plant (KNP) tripped off line on Saturday evening and did not return to service until late afternoon Sunday, October 13, 1991. Proceeding with the Unit 1 shut down while PBNP Unit 2, and the KNP were off line would have placed the regional power distribution system in an undesirable condition relative to electrical system stability. Due to the delay in the scheduled Unit 1 outage, the time window which would allow proper coordination between system demand and workforce availability was exceeded.

Wisconsin Electric requested a Temporary Waiver of Compliance on October 13, 1991, which would reduce the minimum degree of redundancy requirements for the NFPR and OTAT channels. The NRC did not approve the October 13, 1991, Temporary Waiver of Compliance request as submitted. However, verbal approval was granted which would defer the monthly surveillance tests associated with the NFPR and OTAT channels for 30 days.

Subsequent review of the test requirements shows that the OPAT, pressurizer pressure, and PORV operability functions should also be encompassed by this waiver. Due to the system hardware configuration, testing of these three additional functions requires placing the OTAT channel in the tripped condition. Therefore, the risk of a Unit 1 reactor trip as a result of a N44 output spike simultaneous with the surveillance testing of the

NFPR and OTAT also applies to the surveillance testing of the OPAT, pressurizer pressure and PORV operability functions. These additional inclusions to our Temporary Waiver of Compliance request were discussed with the NRC on October 14, 1991.

As discussed on October 13, 1991, the N44 power range problem will be resolved prior to the next required surveillance. This may include a Unit 1 shut down to replace the N44 power range detector.

SAFETY SIGNIFICANCE AND POTENTIAL CONSEQUENCES

The safety significance of deferring the monthly surveillance testing of the NFPR, OTAT, OPAT, pressurizer pressure, and PORV operability functions by 30 days is dependent on the extent of bistable drift which will occur over the time period from the last surveillance test. The linear extrapolation of bistable drift data in the non-conservative direction from the existing setpoints shows that the surveillance tests for the NFPR, OTAT, OPAT, pressurizer pressure, and PORV operability failures can be deferred for 30 days without adversely affecting the reliability of the trip functions. This conclusion is based on an evaluation of bistable drift data for the purpose of performing the surveillance tests at less frequent intervals.

JUSTIFICATION FOR DURATION

The monthly requirement to perform surveillance tests of the NIS was exceeded at 2400 hours on October 13, 1991, and the monthly surveillance requirements for the other functions of concern will be due prior to 2400 hours on October 18, 1991. Therefore, the incorporation of the 30 day deferral will make the surveillance tests of the NIS due prior to 2400 hours on November 12, 1991, and the surveillance tests for the other circuits due prior to 2400 hours on November 17, 1991.

It is anticipated that the surveillance tests will be performed prior to the dates above in that the surveillance tests will be scheduled in conjunction with resolution of the N44 output spikes.

SIGNIFICANT HAZARDS CONSIDERATION

The PBNP Manager's Supervisory Staff has reviewed the potential for this waiver to create a significant hazard and has concluded that no significant hazard is created. The deferral of surveillance tests by 30 days does not: (1) involve a significant increase in the probability or consequences of an accident previously analyzed; or (2) create the possibility of a new or different kind of accident; or (3) involve a significant reduction in a margin of safety.

The only consequence as a result of deferring the surveillance tests by 30 days is an increase in the total bistable drift which could occur before the surveillance test is performed. However, sufficient setpoint conservatism exists when the amount of expected drift is compared to the existing setpoints for the NFPR, OTAT, OPAT, pressurizer pressure reactor protection, and PORV operability functions.

ENVIRONMENTAL CONSEQUENCES

There are no environmental consequences which result from this Temporary Waiver of Compliance.

Very truly yours,



G. J. Maxfield
Plant Manager

jmg

Attachment

cc: USNRC Resident Inspector
USNRC Regional Administrator, Region III