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POWER COMPANY

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10 CFR 50.4
10 CFR 50.90
10 CFR 50.12

Document Control Desk
US NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATIONS CHANGE REQUEST 186
AND REQUEST FOR EXEMPTION FROM 10 CFR 50, APPENDIX J
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 Plant (PBNP) Units 1 and 2, respectively, to incorporate changes to the plant Technical Specifications. The proposed revisions will modify Technical Specification Section 15.4.4, "Containment Tests," Specification I.C.1 to state that Type A (Integrated Leak Rate Test or ILRT) tests shall be conducted in accordance with 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors," as modified by approved exemptions.

Additionally, in accordance with the requirements of 10 CFR 50.12, we are requesting a one-time (temporary) exemption from 10 CFR 50, Appendix J to permit the Type A test for Unit 2 to be performed during the 23rd refueling outage rather than the 22nd refueling outage.

The requested Technical Specifications change and exemption will grant temporary relief from 10 CFR 50, Appendix J, Section III.D.1(a) which requires PBNP Unit 2 to perform a Type A test during the Fall, 1996 refueling outage. The Unit 2 Type A test will be postponed until the Fall, 1997 refueling outage.

We are planning to replace both steam generators in Unit 2 during the Fall, 1996 outage. We will not be making any major modifications to the containment structure itself during this work. Transportation of the existing and replacement steam generators out of and into containment will be done via the existing equipment hatch. No cutting of the containment structure or liner plate is required. Welding of the main steam and feedwater lines after installation of the replacement steam

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generators will be followed by appropriate inspections and testing to ensure the integrity of these containment penetrations is maintained. No other work that could affect the containment structure is scheduled for the Fall 1996 outage.

Deferral of the Type A test will reduce outage scope and duration. Furthermore, deferral of the Type A test by one cycle will allow time to prepare for a full pressure test which must be performed in order to adopt the provisions of Appendix J, Option B.

Information supporting the Technical Specification Change Request and exemption request is enclosed.

We request, that if approved and granted, this Technical Specifications Change Request and Exemption Request be issued by April 12, 1996, and become effective within 45 days of issuance in order to eliminate committed costs and pre-outage expenses associated with performance of the Type A test during the Unit 2 Fall 1996 outage.

If you require additional information, please contact us.

Sincerely,

Bob Link
Vice President
Nuclear Power

KVA/jg

cc: NRC Resident Inspector
NRC Regional Administrator
PSCW

TECHNICAL SPECIFICATIONS CHANGE REQUEST 186
TYPE A PERIODIC RETEST SCHEDULE REQUIREMENTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

INTRODUCTION

This requested change to the Point Beach Nuclear Plant (PBNP) Technical Specifications (TS) is administrative in nature and will allow PBNP to implement exemptions to Appendix J schedule requirements which may be granted by the NRC. As presently written, the Technical Specifications require compliance with Appendix J without allowance for any exemptions to the Appendix J mandated schedule.

DESCRIPTION OF CURRENT LICENSE CONDITION

Technical Specification 15.4.4.I.C.1 states, in part, that "...two integrated leakage rate tests shall be performed at approximately equal intervals between each major shutdown for inservice inspection to be performed at ten-year intervals. In addition, an integrated test shall be performed at each ten-year interval, coinciding with the in-service inspection shutdown."

DESCRIPTION OF PROPOSED CHANGES

The proposed changes will modify Specification 15.4.4.I.C.1 to read as follows:

> "1. The retest schedules for Type "A" tests shall be in accordance with 10 CFR 50, Appendix J, as modified by approved exemptions."

BASIS AND JUSTIFICATION

Elimination of the specific Type A test interval text from the Technical Specifications will allow future changes to the interval by exercising an Appendix J exemption without requiring additional Technical Specification changes. The test interval details are marginal to operational safety and are repeated in 10 CFR 50, Appendix J and plant implementing procedures. Therefore, these details are proposed to be removed from the Technical Specifications.

ENVIRONMENTAL ASSESSMENT

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 any effluent release, or result in any significant increase in individual or cumulative occupational exposure. Therefore, we conclude that the proposed amendments meet the requirements of 10 CFR 51.22(c)(9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

SAFETY EVALUATION

The Type A test is performed to determine that the total leakage from containment does not exceed the maximum allowable leakage rate (L_a) at a calculated peak containment internal pressure (P_a) as defined in 10 CFR 50, Appendix J. The containment limits fission product leakage during and following design basis events in accordance with the requirements described in 10 CFR 100, "Reactor Site Criteria."

There are no physical or operational changes to the containment structure, system, or components as a result of the proposed changes. Nor does the proposed license amendment in and of itself change any test schedules. It is an administrative change which will allow changes to the Type A test frequency when the NRC grants an exemption. Each request for specific exemption would require evaluation on its own merits to determine its safety impact. Therefore, this amendment does not introduce any safety concerns.

NO SIGNIFICANT HAZARDS CONSIDERATION

In accordance with the requirements of 10 CFR 50.91(a), we have evaluated the proposed changes against the standards of 10 CFR 50.92 and have determined that operation of PBNP, Units 1 and 2, in accordance with the proposed amendments does not present a significant hazards consideration. The analysis of the requirements of 10 CFR 50.92 and the basis for this conclusion are as follows:

1. Operation of this facility under the proposed Technical Specifications will not create a significant increase in the probability or consequences of an accident previously evaluated.

   The proposed license amendment has no impact on plant operation or accident analyses. It is an administrative change which allows implementation of approved exemptions to Type A test scheduling requirements and, by itself, does not change any retest schedules. Therefore, this license amendment does not involve a significant increase in the probability or consequences of any accident previously evaluated.

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 proposed license amendment allows implementation of approved exemptions to Type A test scheduling requirements and is administrative in nature. No change to the design, configuration, or method of operation of the plant is made by this change. Therefore, this license amendment does not create the possibility of a new or different kind of accident from any accident previously evaluated.

3. Operation of this facility under the proposed Technical Specifications change will not create a significant reduction in a margin of safety.

The proposed license amendment does not, by itself, change existing Technical Specification operability or surveillance requirements. The proposed license amendment is an administrative change which allows implementation of approved exemptions to Type A test scheduling requirements. Therefore, this license amendment does not involve a significant reduction in the margin of safety.

EXEMPTION REQUEST FROM 10 CFR 50, APPENDIX J
TYPE A PERIODIC RETEST SCHEDULE REQUIREMENTS
POINT BEACH NUCLEAR PLANT, UNIT 2

INTRODUCTION

In accordance with 10 CFR 50.12, Wisconsin Electric (WE) requests a one-time (temporary) exemption from the requirements of 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water Cooled Power Reactors," Section III.D.1(a) for Point Beach Nuclear Plant, Unit 2. This exemption, along with our Technical Specifications Change Request 186, will allow a one-time test interval extension for the Unit 2 Type A test from the Fall, 1996 outage to the Fall, 1997 outage. This represents an extension of the interval between Type A tests on Unit 2 from approximately 48 months to approximately 60 months.

BACKGROUND

10 CFR 50, Appendix J, Section III.D.1(a) requires as set of three Type A tests to be performed, at approximately equal intervals, during each 10-year service period. Point Beach Technical Specifications mirror this requirement in Specification 15.4.4.1.C.1.

The first Type A test of the third 10-year service period for Unit 2 was performed during the Fall, 1992 outage. Hence the second Type A test is required to be performed no later than the Fall, 1996 outage.

BASIS FOR EXEMPTION REQUEST

We are planning to replace both steam generators in Unit 2 during the Fall, 1996 outage. Deferral of the Type A test will reduce outage scope and duration. It will benefit Wisconsin Electric shareholders through more efficient use of plant resources and increased generation of low cost electricity.

Furthermore, deferral of the Type A test by one cycle will allow time to prepare for a full pressure test which must be performed in order to adopt the provisions of Appendix J, Option B. All past periodic Type A tests at PBNP have been conducted at reduced pressure. More equipment must be obtained and implementing procedures must be changed to account for performing a full pressure test instead of a reduced pressure test.

PBNP UNIT 2 TYPE A TESTING

Point Beach Technical Specification 15.4.4.1.B specifies acceptance criteria for Type A tests. The maximum allowable leakage rate (L_a) for peak pressure tests is 0.40 weight percent of containment atmosphere per day at a test pressure (P_a) of 60 psig. To assure that the PBNP containments meet these requirements, Type A tests have been performed prior to and since plant startup in accordance with the PBNP Technical Specifications and Appendix J.

Appendix J allows testing at a reduced pressure (P_t) which is not less than one-half of P_a. A corresponding allowable leakage rate (L_t) is defined as the acceptance criteria for a reduced pressure test. As an added conservatism, the acceptance criteria for the measured overall integrated leakage rate (L_{tm}) is reduced to $0.75L_t$.

The preoperational test at PBNP, Unit 2 was conducted on March 12, 1971. This test was performed initially at full pressure. The test was also performed at reduced pressure to develop a correlation between the leakage at full and reduced test pressures. These tests yielded an L_t of 0.268 weight percent per day for subsequent resets at a P_t of 30 psig.

The six periodic Type A tests on Unit 2 conducted since the preoperational test have been performed at reduced pressure. The tests are conducted at the beginning of the outage prior to off-loading the reactor core. These "as-found" tests verify that the containment remained leak tight during operation since the previous test.

The PBNP containments have an excellent Type A test performance history that provides substantial justification for the proposed schedular exemption. The Unit 2 containment has never failed a Type A test. The five Type A tests conducted since plant start-up have all been less than 63% of the allowable test leakage rate, L_t, at the 95% upper confidence level.

SAFETY EVALUATION

Factors affecting leak tightness of containment may be categorized as active components such as valves and seals or passive components which constitute the containment structure. Active components are tested during each refueling outage by the appropriate Type B or C tests. Depending on the way these components are configured, they are again tested when the containment is subjected to a Type A test.

Industry experience indicates that the failures associated with Type A tests are generally found on active components which receive Type B or C testing. This exemption request proposes to defer only the Type A test; the Type B and C tests will be performed as scheduled during the Fall, 1996 outage. Therefore, continued leak tightness of the active components can be assured by the Type B and C testing program.

The passive, structural capability of the containment could be adversely affected by modifications to the structure or deterioration of the structure caused by pressure, temperature, radiation, chemical, or other effects.

Based on a review of activities, we have concluded that there have not been any alterations or challenges to the Unit 2 primary containment since the last Type A test. We will not be making any major modifications to the containment structure itself during the Fall, 1996 refueling outage. Transportation of the existing and replacement steam generators out of and into containment will be done via the existing equipment hatch. No cutting of the containment structure or liner plate is required. Welding of the main steam and feedwater lines after installation of the replacement

steam generators will be followed by appropriate inspections and testing to ensure the integrity of these containment penetrations is maintained. No other work that could affect the containment structure is scheduled for the Fall, 1996 outage.

In the absence of actual accident conditions, structural deterioration is a gradual phenomenon occurring over a period of time well in excess of the proposed interval extension. Other than accident conditions, the only other pressure challenge to containment is the Type A test itself. PBNP Unit 2 has not experienced an accident or containment challenge that would adversely impact its structural integrity or leak tightness.

10 CFR 50, Appendix J requires a visual inspection of the accessible interior and exterior surfaces of the containment structure and components to be performed prior to the Type A test to identify any evidence of structural deterioration which may affect either the containment structure or its leak tightness. The PBNP Technical Specifications also require this visual inspection to be performed annually. Previous visual inspections have not identified any evidence of structural deterioration. The visual inspection will be performed on Unit 2 as scheduled during the Fall, 1996 outage.

Extensions of the interval between consecutive Type A tests well beyond the interval we are requesting have previously been approved by the NRC for other licensees. Furthermore, Option B to Appendix J allows an interval of 10 years between consecutive Type A tests if previous test performance is adequate. The NRC recently approved Option B as an initiative to eliminate requirements that are marginal to safety yet impose a significant regulatory burden on licensees. The technical basis for the NRC's rulemaking is provided in NUREG 1493, "Performance-Based Containment Leak-Test Program." NUREG 1493 concludes that a reduction in the frequency of Type A tests from the current three per 10 years to one per 10 years leads to an imperceptible increase in risk. The increase is very small because Type A tests identify only a few potential containment leakage paths that cannot be identified by Type B and C testing, and the leaks that have been found by Type A tests have been only marginally above existing requirements.

Based on the above, we believe that, in accordance with 10 CFR 50.12(a)(1), the granting of this exemption request will not present undue risk to the health and safety of the public and is consistent with the common defense and security.

COMPLIANCE WITH 10 CFR 50.12 EXEMPTION SPECIFICATIONS

Pursuant to 10 CFR 50.12(a)(2), the NRC will not consider granting an exemption from the requirements of the regulations unless special circumstances are present. This exemption request meets the special circumstances of paragraphs 10 CFR 50.12(a)(2)(ii), (iii), and (v) as described below:

Paragraph (a)(2)(ii) - The underlying purpose of the regulation is achieved.

10 CFR 50, Appendix J states that the leakage test requirements set forth in Appendix J provide for periodic verification by tests of the leak-tight integrity of the primary reactor containment.

The appendix further states that one of the purposes of the tests is to assure that leakage through the primary reactor containment shall not exceed allowable leakage rate values as specified in the TS or associated bases.

As stated above, the PBNP, Unit 2 containment leakage has historically been very low and a Type A test has never failed. Type B and C test results have also been consistently low.

Based on a review of activities, we have concluded that there have not been any alterations or challenges to the Unit 2 primary containment since the last Type A test. Also, there are no maintenance activities scheduled during the Fall, 1996 outage or proposed extended test interval that will adversely affect the passive, structural capability of the Unit 2 containment. Any maintenance performed on containment penetrations or seals will be followed by the appropriate local leak rate (Type B or C) test as required by Appendix J.

The leak tightness of the containment will continue to be verified during the extended interval by the performance of Type B and C testing. Furthermore, this exemption request is only to delay the performance of the next scheduled Type A test on Unit 2, not to eliminate it. The Type A test will be performed during the Fall, 1997 refueling outage. Therefore, the underlying purpose of the regulation is achieved.

Paragraph (a)(2)(iii) - Compliance will result in undue hardship.

The PBNP Unit 2 Fall, 1996 outage is currently scheduled for 70 days to allow for steam generator replacement. In order to adopt the provisions of Appendix J, Option B, the next Type A test performed on Unit 2 will be a full pressure test. Performance of a full pressure test on Unit 2 during the Fall, 1996 outage will add approximately five days of critical path outage time which results in five days of lost electricity production.

As discussed above, performance of the Type A test during the Fall, 1996 outage is not necessary to assure the leak tightness of containment. Performance of this unnecessary test will result in unnecessary additional personnel radiation exposure and costs associated with performance of the test and associated increase in outage duration.

Paragraph (a)(2)(v) - The exemption provides only temporary relief from the appropriate regulation.

This exemption request proposes temporary relief from the requirements of 10 CFR 50, Appendix J, Section III.D.1 to perform a Type A test on PBNP, Unit 2 during the Fall, 1996 refueling outage. The Type A test will be performed during the Fall, 1997 refueling outage.

ENVIRONMENTAL ASSESSMENT

We have determined that the proposed exemption request does not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in individual or cumulative occupational exposure. Therefore,

we conclude that the proposed exemption request meets the requirements of 10 CFR 51.22(c)(9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.