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

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
SUPPLEMENT TO TECHNICAL SPECIFICATIONS
CHANGE REQUEST 192
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated September 30, 1996, Wisconsin Electric requested Technical Specifications change request 192. This Technical Specifications change request proposes to modify Technical Specifications Section 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 1, "Westinghouse Owner's Group Improved Standard Technical Specifications," and modify the operability requirements for the service water system. The proposed changes to Technical Specifications Section 15.3.7, "Auxiliary Electrical Systems," also reflect the modified service water operability requirements. The proposed change to Technical Specifications Section 15.5.2, "Containment," modifies the heat removal capacity of the reactor containment air cooler units. A supplement to this Technical Specifications change request was provided in a letter dated November 13, 1996.

This letter also provides supplemental information for Technical Specifications change request 192. The attached supplement proposes to modify the proposed Technical Specifications changes as follows:

1. Change TS 15.3.3.C to require four operable component cooling water pumps for two unit operation. The current requirement is three component cooling water pumps for two unit operation. Additionally, the allowed outage time for one component cooling water pump is being changed from 24 to 72 hours. The net effect of these two changes is a substantial improvement from the existing CCW Technical Specifications, because previously one of the four pumps could have been inoperable indefinitely without limitation.

2. Modify the proposed TS 15.3.3.D.2.d to require 5 operable service water pumps for entry into this limiting condition for operation instead of the originally proposed requirement of four service water pumps. This change provides added assurance that sufficient service water flow will be available for all necessary equipment if the containment fan cooler outlet motor operated valves are open in both units during an accident.

3. The proposed removal of the containment cooling capability statement in the basis of Technical Specifications Section 15.3.3 is not needed. The capability statement was being removed from the Technical Specifications basis because it does not directly support any of the operability requirements or LCOs for the containment cooling systems. This statement is being left in the basis in recognition that this capability always was and still is available.

We have determined that the additional information 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 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. The original "No Significant Hazards" determinations for operation under the proposed Technical Specifications remain applicable.

We have found a typographical error in our previous supplement to this Technical Specifications change request. The response to request for additional information, dated November 26, 1996, references a previous submittal regarding IEB 80-04, dated August 27, 1989, in the response to Question 2. The date of the previous submittal regarding IEB 80-04 should be July 27, 1989.

Please contact us if you have any questions.

Sincerely,

Gary M. Krieser
Manager-Nuclear Industry
& Regulatory Services

CAC

cc: NRC Resident Inspector
NRC Regional Administrator
PSCW

Subscribed and sworn before me on
this 12th day of December, 1996.

Notary Public, State of Wisconsin
My commission expires 10/27/2000

TECHNICAL SPECIFICATION CHANGE REQUEST 192
SUPPLEMENTAL INFORMATION

Introduction

In a letter dated September 30, 1996, Wisconsin Electric requested Technical Specifications change request 192. This Technical Specifications change request proposes to modify Technical Specifications section 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 1, "Westinghouse Owner's Group Improved Standard Technical Specifications," and modify the operability requirements for the service water system. The proposed changes to Technical Specifications section 15.3.7, "Auxiliary Electrical Systems," also reflect the modified service water operability requirements. The proposed change to Technical Specifications section 15.5.2, "Containment," modifies the heat removal capacity of the reactor containment air cooler units. A supplement to this Technical Specifications change request was provided in a letter dated November 13, 1996.

This supplement proposes to modify the proposed Technical Specifications changes as follows:

1. Change TS 15.3.3.C to require four operable component cooling water pumps for two unit operation. The current requirement is three component cooling water pumps for two unit operation. Additionally, the allowed outage time for one component cooling water pump is being changed from 24 to 72 hours. The net effect of these two changes is a substantial improvement from the existing CCW Technical Specifications, because previously one of the four pumps could have been inoperable indefinitely without limitation.
2. Modify the proposed TS 15.3.3.D.2.d to require five operable service water pumps for entry into this limiting condition for operation instead of the originally proposed requirement of four service water pumps. This change provides added assurance that sufficient service water flow will be available for all necessary equipment if the containment fan cooler outlet motor operated valves are open in both units during an accident.
3. The proposed removal of the containment cooling capability statement in the basis of Technical Specifications section 15.3.3 is not needed. The capability statement was being removed from the Technical Specifications basis because it does not directly support any of the operability requirements or LCOs for the containment cooling systems. This statement is being maintained in the basis in recognition that this capability always was and still is available.

Evaluation of these revised proposed Technical Specifications changes is provided in the following safety evaluation. The "No Significant Hazards Consideration" provided in the

original Technical Specifications change request was reviewed. The results of this review are provided in this supplemental information. The revised edited Technical Specifications are also provided as an attachment.

Safety Evaluation

Proposed change 1.

In the previous supplement to this Technical Specifications change request (letter dated November 26, 1996), it was noted that the component cooling water (CCW) Technical Specification could be substantially improved by changing the operability requirement for two unit operation from three pumps to four. Along with this operability requirement change, it is necessary to increase the allowed outage time for one of the required CCW pumps from 24 to 72 hours. The net effect of these two changes is still a substantial improvement from the existing CCW Technical Specifications, because previously one of the four pumps could have been inoperable indefinitely without limitation.

The basis for Technical Specification section 15.3.3 states, "The component cooling water system is different from the other systems discussed above in that the components are so located in the Auxiliary Building as to be accessible for repair after a loss-of-coolant accident. The component cooling water pump together with one component cooling water heat exchanger can accommodate the heat removal load on one unit either following a loss-of-coolant accident, or during normal plant shutdown. If during the post-accident phase the component cooling water supply is lost, core and containment cooling could be maintained until repairs are effected." In support of this Technical Specifications basis, section 9.3 of the FSAR states, "If a break of a component cooling line occurs outside the containment, the leak could either be isolated and repaired, or the system could be shutdown for repairs depending on the position in the loop at which the break occurred. Access is available to required components. During this period, no heat removal from the containment by the residual heat removal system is required since the fan coolers' capability using service water exceeds decay heat generation."

The current Technical Specifications for CCW, section 15.3.3.C, require two operable pumps for single unit operation and three operable pumps for two unit operation. For two unit operation, a single failure of one of the CCW pumps would leave two operable pumps which is greater than the minimum requirement of one pump for accident mitigation. For single or dual unit operation, the single failure of a train of emergency power after a loss of offsite power could leave one operable pump which is the minimum requirement for accident mitigation.

FSAR Chapter 9 contains substantial information regarding the design and operation of the PBNP CCW system. The CCW system is considered part of the auxiliary cooling system (ACS) for the reactor. It is not automatically initiated for accident mitigation. Operator action is required to initiate the ACS reactor cooling function. The general design criteria in the PBNP FSAR related to the CCW system (GDC 41 and 52) described

in section 9.1 state that the system shall provide sufficient performance capability to accommodate the failure of any single active component without resulting in undue risk to the health and safety of the public.

FSAR Appendix B, "Functional Evaluation of the Components of the Systems Shared by the Two Units," states that two pumps are required for LOCA in one unit and hot shutdown of the other unit. This evaluation was based on four CCW pumps normally available. The repair capability for this system can be applied to the situation described above where two of the three available pumps could be assumed to fail. In this case the repair would be performed to restore a second pump.

The CCW pumps are normally aligned with two pumps to each unit, one pump in each train per unit. If four CCW pumps are available at the outset of an event, a single failure of one train of emergency equipment would leave one operable CCW pump in each unit. This configuration is consistent with the evaluation of the CCW system function contained in FSAR Appendix B described above. The capability of the CCW system starting with four pumps leaves two operational pumps after the failure of an entire train. This is considered preferable to the situation of starting with the three operable pumps because a repair is not necessary to restore a CCW pump and the possible requirement for cross-connection of the Unit 1 and Unit 2 CCW systems would not be needed. Therefore, the proposed Technical Specifications require four operable CCW pumps for two unit operation.

The proposed change from a 24 hour allowed outage time to a 72 hour allowed outage time is necessary to provide adequate time to repair a CCW pump. This allowed outage time is consistent with the allowed outage time for CCW contained in NUREG 1431, Revision 1, "Westinghouse Owner's Group Improved Standard Technical Specifications." As stated previously, the net effect of the increased operability requirement and longer allowed outage time is an improvement in the Technical Specifications. These changes provide added assurance that two pumps will be operable for accident mitigation in one unit and safe shutdown of the other.

Proposed Change 2.

The following description was provide in the original Technical Specifications change request:

> Insert new specification 15.3.3 D.2.d to allow the containment fan cooler outlet motor operated valves to be open provided they are returned to the closed position within 72 hours. The containment fan cooler service water outlet motor operated valves consist of two fully redundant valves that are automatically opened in response to a safety injection signal. Either valve is capable of passing the full flow required for all four fan cooler units in accident mode. At various times, these valves are opened to allow testing of the containment fan coolers or adjustment of the system flow rates. If one or both of these motor operated valves are open in a

unit, there may be insufficient service water flow if an accident occurs in the other unit and a single failure occurs. Therefore, in this case, the other unit is in a limiting condition for operation because relaxation of single failure is necessary. That unit would be considered the "affected unit" and hence the valves must be closed within 72 hours or the affected unit must be shutdown. If the valves are open in both units, they would both be considered "affected" until such time that the motor operated valves were closed for a unit, at which time the affected unit would be the unit with the closed valves.

The 72 hour allowed time is consistent with the relaxation of single failure and allowed outage time associated with a loss of redundancy for the service water system. For the case of single unit operation, the valves for the operating unit may be open without limitation if the valves for the shutdown unit are in the shut position or the flowpath is isolated.

The additional provision that requires at least four service water pumps to be operable incorporates the appropriate restriction to allow coincidental entry into any of these service water system LCOs, as stated in the description of change to TS 15.3.3.D.2.

The two ways that this LCO can be exited have been added to this LCO for clarity. The two ways this LCO can be exited include isolating the flowpath or returning the valves to the closed position.

The modification to the proposed TS 15.3.3.D.2.d to require five operable service water pumps for entry into this limiting condition for operation, instead of the originally proposed requirement of four service water pumps, provides added assurance that sufficient service water flow will be available for all necessary equipment if the containment fan cooler outlet motor operated valves are open in both units during an accident and any or all of the other service water LCOs are in effect coincidentally.

Proposed Change 3.

Technical Specifications change request 192 proposes the removal of the following capability statement from the basis of Technical Specifications section 15.3.3:

- In the event of a Design Basis Accident, any one of the following combinations will provide sufficient cooling to reduce containment pressure: (1) four fan coolers, (2) two containment spray pumps, (3) two fan coolers plus one containment spray pump.

The proposed removal of the containment cooling capability statement in the basis of Technical Specifications section 15.3.3 is not needed. The capability statement was being removed from the Technical Specifications basis because it does not directly support any of the operability requirements or LCOs for the containment cooling systems. This statement is being maintained in the basis in recognition that this capability always was and

still is available. In support of the reinstatement of this capability statement in the basis of section 15.3.3, analysis has been performed that shows the four fan cooler capability to maintain the post-accident containment pressure below the design value is still valid. The results of this analysis (which are attached to the November 26, 1996 submittal) show that the containment pressure and temperature response are not significantly affected by the reduction in fan cooler heat removal rate. This analysis also includes the effect of steam generator replacement, for completeness.

Additionally, the emergency operating procedures are being reviewed and revised as necessary to allow operation of the containment spray system during the recirculation phase of a LOCA. Containment spray continues to be considered to operate during the injection phase of a LOCA. By proceduralization of containment spray operation during the recirculation phase of a LOCA, the capability statement is valid during both the injection and recirculation phases of a LOCA. The emergency operating procedures can continue to allow containment spray to be stopped at the end of the injection phase of a LOCA based on the analyses that show containment pressure and temperature during this phase of the accident remain acceptable. Further evaluation of the environmental consequences of the loss of coolant accident (FSAR Section 14.3.5) is in progress. We expect to provide the results of this evaluation within a few weeks.

Review of "No Significant Hazards Consideration"

The original "No Significant Hazards Consideration" provided with Technical Specifications change request 192 has been reviewed. The proposed modifications to this license amendment request do not alter any conclusions or the basis for these conclusions provided in the original "No Significant Hazards Consideration."

The only part of the original evaluation that is affected by these proposed modifications is the specific reference to the plant systems that are the subject of this license amendment request. The first section of the original "No Significant Hazards Consideration" states:

> This license amendment request proposes to change the limiting conditions for operation, action statements, allowable outage times, and design specifications for the Point Beach Nuclear Plant Technical Specifications associated with the containment accident fan coolers, service water equipment, and normal and emergency power supplies.

The proposed modification to this license amendment request proposes the inclusion of a improvement to the limiting condition for operation associated with the component cooling water pump operability requirement for two unit operation. As stated previously, these changes provide added assurance that two pumps will be operable for accident mitigation in one unit and safe shutdown of the other. Therefore, the conclusions and the basis for the conclusions in the "No Significant Hazards Consideration" are not changed.