Wisconsin Electric
POWER COMPANY

Point Beach Nuclear Plant
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NPL 97-0378

10 CFR 50.4
10 CFR 50.54(f)
10 CFR 50.90

June 25, 1997

U.S. NUCLEAR REGULATORY COMMISSION
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Gentlemen:

DOCKETS 50-266 AND 50-301
REVISION TO GENERIC LETTER 96-06, 120-DAY RESPONSE AND
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. Technical Specifications Change Request 192 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. Previous supplements to this Technical Specifications Change Request were provided in letters dated November 26, 1996, December 12, 1996, February 13, 1997, March 5, 1997, April 2, 1997, April 16, 1997, May 9, 1997, and June 3, 1997.

This letter also provides additional information for Technical Specifications Change Request 192. Attachment 1 to this letter contains our commitment, as discussed with the NRC staff during conference calls on June 24, 1997, and June 25, 1997, to operate the Point Beach Nuclear Plant in accordance with current service water system analyses. Additional analyses being performed to support revised service water/component cooling water system configurations will be discussed with NRC staff as they are completed.

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We have determined that the additional information provided with this letter 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.

Attachment 2 provides an update to commitments made in our responses to Generic Letter 96-06, "Assurance of Equipment Operability and Containment Integrity During Design Basis Conditions." In our January 27, 1997, response to the NRC's request in the Generic Letter, we informed the staff that we had evaluated the potential for boiling and water hammer in the service water/containment fan cooler systems and had determined that effects on the systems, as a result of this postulated, temporary condition, constituted an unreviewed safety question. It is the intent of Wisconsin Electric to restore the system to full conformance with the design and licensing bases for PBNP. Although a temporary non-conforming condition exists, no change to the facility is being made to accept this condition. Corrective action for this temporary condition is governed by our corrective action process in accordance with the requirements of 10 CFR 50, Appendix B and guidance in Generic Letter 91-18. For this reason, we no longer believe an unreviewed safety question exists and this issue need not be considered in concert with the proposed license amendments.

Please contact us if you have any questions.

Sincerely,

A. J. Cayia
Plant Manager
Point Beach Nuclear Plant

Attachment

cc: NRC Resident Inspector
NRC Regional Administrator
PSCW

Subscribed and sworn before me on
this 25th day of June, 1997.

Christine K. Pozorski
Notary Public, State of Wisconsin, Manitowoc County

My commission expires 8/30/98.

Attachment 1

COMMITMENT TO OPERATE POINT BEACH NUCLEAR PLANT IN ACCORDANCE WITH SERVICE WATER SYSTEM ANALYSES

On June 11, 1997, the NRC was notified of the discovery of a condition in which Point Beach Nuclear Plant could be in an unanalyzed condition for the service water system. Event Number 32467 reports that the service water analyses for accident mitigation is based on the use of one component cooling water (CCW) heat exchanger for normal operational component cooling water system operation at the start of a large break loss of coolant accident. During conditions of high service water system temperature (approximately 71°F based on operational experience), two heat exchangers have been employed for operating a unit to maintain component cooling water temperatures within current specifications. If two CCW heat exchangers are in service to one or both units at the start of a large break loss of coolant accident, sufficient service water flow may not be available to other equipment supplied from the service water system under minimum system operating conditions.

Therefore, Wisconsin Electric hereby provides the following commitment to operate Point Beach Nuclear Plant in accordance with service water system analyses applicable to the operating conditions:

Wisconsin Electric will operate Point Beach Nuclear Plant in accordance with its service water system analyses and approved procedures. Specifically, each unit will utilize only one CCW heat exchanger until such time that analyses are completed and the service water system reconfigured as necessary to allow operation of one or both units with two heat exchangers in service. If two CCW heat exchangers are required in one or both units for maintaining acceptable component cooling water temperature prior to completion of necessary analyses to allow operation in the required configuration, the service water system will be considered in an unanalyzed condition, declared inoperable and action taken as specified by Technical Specification 15.3.0.B except for short periods of time as necessary to effect procedurally controlled changes in system lineups and unit operating conditions.

Technical Specification 15.3.0.B states, "In the event an LCO cannot be satisfied because of equipment failures or limitations beyond those specified in permissible conditions of the LCO, action shall be initiated within one hour to place the affected unit in: 1. Hot shutdown within seven hours of entering this specification; AND 2. Cold shutdown within 37 hours of entering

this specification. This specification is applicable during power operation, low power operation, and shutdown with temperature ≥200°F."

The exception stated in the commitment to allow operation with two heat exchangers in service to a unit for short periods of time is to facilitate short-term, normal evolutions such as switching from one heat exchanger to another. This allows a short period of time under direct operator control. If an accident were to occur, rapid operator action to re-establish single heat exchanger operation would be taken.

Operation of the CCW heat exchangers in order to cool down a unit is also a transient situation. Single CCW system heat exchanger operation can be re-established after the cooldown is complete and decay heat loads are within the heat removal capability of that heat exchanger. This transient condition for cooldown of a unit is not a current design basis requirement for service water system operation. This issue is being reviewed to determine whether it should be incorporated into the design basis of the service water system.

The results of our analyses will be discussed with the NRC staff as they are completed and approved.

Attachment 3 to the initial Technical Specifications Change Request 192 submittal dated September 30, 1996, states, "In early 1996, Wisconsin Electric contracted Westinghouse to evaluate the effect of reduced containment cooling on the Point Beach containment integrity analysis. The evaluation was requested due to a concern that service water flow to the containment fan coolers may have been inadequate to support the heat removal assumptions of the original containment integrity analysis (FSAR Section 14.3.4)." The following information provides further explanation of the cause and effect relationship of reduced containment fan cooler heat transfer and reduced containment fan cooler service water flow rate requirements.

The reduction in service water flow causes reduced heat transfer in the containment fan coolers. The reduced flow also allows a higher pressure to be maintained in the containment fan coolers. The higher pressure assures that the additional design basis requirement contained in Section 6.3.1 of the Point Beach FSAR is maintained. This additional design basis requirement states, "In removing heat at the design basis rate, the cooling coils are capable of discharging the resulting condensate without raising the exit temperature of the service water to the boiling point." In addition, the lower service water flow requirement for the containment fan coolers leaves more flow available for other equipment supplied by the service water system.

Wisconsin Electric response to Nuclear Regulatory Commission Generic Letter 96-06, dated October 30, 1996, includes by reference a September 30, 1996, submittal to the NRC. The September 30, 1996, letter addresses the possibility for two-phase flow conditions in containment fan coolers. Technical Specifications Change Request 192 and the response to Generic Letter 96-06 rely on the same service water system and containment fan cooler analyses.

Attachment 2

GENERIC LETTER 96-06 ISSUES UPDATE RELATED TO SERVICE WATER AND CONTAINMENT FAN COOLERS

Generic Letter 96-06, "Assurance of Equipment Operability And Containment Integrity During Design Basis Conditions," requested licensees to perform evaluations and take actions if necessary to ensure that containment cooling water systems and other water filled piping sections inside containment remain operable during design basis accident conditions. One of the postulated conditions was water hammer and two-phase flow conditions occurring in containment cooling systems during a design basis accident. Wisconsin Electric provided its 30-day response to Generic Letter 96-06 on October 30, 1996.

As discussed in our October 30, 1996 response, Wisconsin Electric had evaluated the potential for water hammer/two-phase flow conditions in the service water system and specifically the service water system to the containment fan coolers, prior to the Generic Letter 96-06 request. Wisconsin Electric determined that the systems were susceptible to such conditions and evaluated the systems' operability with respect to NUREG/CR 5220, 10 CFR 50 Appendix B, and the Technical Specifications with consideration of the guidance of Generic Letter 91-18. The results of these evaluations, supporting our conclusions that the systems remained operable, were provided to the NRC in letters dated September 9, 1996, and September 30, 1996. The conclusion that the systems remained operable, as documented in the evaluations, was based, in part, on the piping stresses induced by the postulated water hammer remaining within ASME III, Appendix F operability limits.

In the attachment to our September 9, 1996, submittal, we provided potential resolution mechanisms for this condition. The intent of the resolution is to ensure that piping stresses within the systems remain within ASME Code design allowables. We have determined that our preferred resolution is to upgrade piping and supports to ensure all stresses remain within Code should the postulated water hammer occur. This action will restore the systems to full conformance with their design and licensing basis for the postulated condition.

Our September 9, 1996, submittal also provided a proposed schedule for restoration of the systems to full conformance. This schedule, which proposed completion of all necessary modifications by the Fall of 1997 was based on each unit commencing and completing a refueling outage in 1997. Due to delays in returning Unit 2 to service and rescheduling of the Unit 1 outage for September 1997, we presently propose completing all modifications by the end of the next Unit 2 outage. This outage is presently scheduled for mid-1998.

Wisconsin Electric provided the requested 120-day response to Generic Letter 96-06 in a January 27, 1997 submittal. As indicated in our 120-day response, an evaluation of this postulated degraded or nonconforming condition was performed using the criteria of 10 CFR 50.59. This evaluation concluded that the existing degraded or nonconforming condition constituted an unreviewed safety question. Based on this evaluation, Wisconsin Electric stated its intent to request a license amendment in accordance

with the regulations to incorporate this condition into the licensing basis for the Point Beach Nuclear Plant.

As indicated above, it is the intent of Wisconsin Electric to restore the systems into full conformance with the design and licensing bases for PBNP. Thus, while a temporary degraded or nonconforming condition exists, no change to the facility is being made to accept this condition. The application of the requirements of 10 CFR 50.59 to this temporary condition was inappropriate. The existing evaluation has been reviewed by our Manager's Supervisory Staff (onsite review committee). It has been determined that an unreviewed safety question does not exist and the evaluation canceled. Corrective action for this temporary condition is governed by our corrective action process in accordance with 10 CFR 50, Appendix B. The schedule provided in our September 9, 1996 submittal as modified herein, ensures that PBNP is restored to full conformance for these conditions at the first available opportunity with due consideration for safety, the operability of the involved systems, and the necessary time for design, procurement and installation of the necessary modifications. Therefore, a license amendment for this condition is not required.