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NPL 99-0731

December 17, 1999

10 CFR 50.90

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Subject: NRC Docket Nos. 50-266 and 50-301
Supplement 1 to Technical Specification Change Request 210
Point Beach Nuclear Plant, Units 1 and 2

- References:
- (1) Letter, C. A. Carpenter (USNRC) to N. J. Liparulo (W), "Acceptance for Referencing of the Topical Report WCAP-14449(P), Application of Best Estimate Large Break LOCA Methodology to W PWRs with Upper Plenum Injection," May 21, 1999
 - (2) Letter, M. E. Reddemann (WE) to USNRC, "Amendment to Facility Operating Licenses to Reflect Required Changes as a Result of Using Upgraded Fuel (TSCR 210)," June 22, 1999
 - (3) Letter, H. A. Sepp (W) to USNRC, "Transmittal of Approved Versions of Topical Report WCAP-14449-P-A, Application of Best Estimate Large Break LOCA Methodology to W PWRs with Upper Plenum Injection," October 29, 1999

Ladies/Gentlemen:

The purpose of this letter is to supplement the Reference (2) letter by informing the NRC that the Reference (3) letter has been issued, report minor discrepancies identified in the Reference (2) submittal, and document a conference call between Wisconsin Electric, NRC, and Westinghouse on the Reference (2) submittal.

Discussion

Westinghouse used the BELOCA methodology described in WCAP-14449(P) in analyses done to support the Reference (2) Technical Specification Change Request (TSCR) to allow the Point Beach Nuclear Plant to use an Upgraded Fuel Design (422V+). The NRC Safety Evaluation Report (SER) contained in Reference (1) advised that the referencing of WCAP-14449(P) in licensing applications was acceptable subject to certain conditions and documentation requirements imposed by the NRC.

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Westinghouse agreed to incorporate these conditions and documentation requirements in a revision to WCAP-14449(P) and provide this approved version to the NRC. This approved version, transmitted by the Reference (3) letter (WCAP-14449-P-A), completed the actions necessary to allow licensees to reference the WCAP in licensing applications. Therefore, the necessary documentation requirements have been met and WCAP-14449-P-A is acceptable for referencing in the Reference (2) submittal. Accordingly, reference 13 on page 77 in Attachment 2 of the Reference (2) submittal should be replaced with the present reference 14, slightly modified to reflect the final approved version of WCAP-14449-P-A, and the old reference 14 should be deleted (see attachment 1 of this letter).

Minor discrepancies have been discovered in Attachment 2 "Safety Evaluation" of the Reference (2) submittal. Section 5.3, page 57 of Attachment 2 inaccurately reported the current licensing basis containment integrity analysis Tavg value as 584.9°F, as opposed to the correct value of 577.9°F. As a result of this discrepancy, Attachment 2, Section 5.3 (Long Term LOCA/Containment Integrity Analysis) should be replaced with the new section included in Attachment 1 of this letter. A new reference (Reference 43) was also added to Section 5.3. This new reference is included in Attachment 1 of this letter and should be inserted into Section 8.0 "References" on page 73 of Attachment 2. In addition, the word "fresh" was inadvertently added to the last sentence of the first paragraph on page 76 of Attachment 2 and should be deleted.

All the above corrections are summarized in Attachment 1 of this letter. These changes do not impact any of the conclusions of the Reference (2) submittal.

Lastly, a conference call between WE, NRC, and Westinghouse staff was held on December 9, 1999 to discuss the Reference (2) submittal. The NRC question and WE's response is given below.

NRC Question:

How does Point Beach/Westinghouse assure that the values for PCT-sensitive parameters input to the LBLOCA and SBLOCA analyses conservatively bound the as-operated plant values for those parameters?

WE Response:

Point Beach has multiple processes and standard practices which ensure that parameters which are PCT-sensitive have assumed values which conservatively bound as-operated plant conditions for the LBLOCA and SBLOCA analyses. An initial parameter assumption list for the accident analyses is developed by the PBNP Nuclear Safety Analysis Group and Westinghouse. This list is then thoroughly reviewed by multiple groups within PBNP to ensure that the assumptions conservatively bound as-operated plant conditions. To ensure future plant changes do not result in as-operated plant conditions outside of the LBLOCA and SBLOCA assumptions, the assumptions are documented in WCAP-15220 and FSAR Chapter 14.

The assumptions and bases for the assumptions for the Chapter 14 accident analyses are also documented in the PBNP Accident Analysis Basis Documents (AABDs). The AABDs, among other things, document the accident analysis methodology and assumptions, including the basis for the assumptions. The AABDs are used by PBNP staff to assist with 10CFR 50.59 Safety Evaluations and to determine if proposed modifications will impact a design basis accident. Furthermore, PBNP System

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Design Basis Documents (DBDs) also document the plant system performance requirements based on the assumptions in the LBLOCA and SBLOCA accident analyses. These documents help to ensure that plant changes will not result in as-operated plant conditions outside of the LBLOCA and SBLOCA assumptions.

Should you have any questions on this submittal or require additional information, please contact us.

Sincerely,



Mark E. Reddemann
Site Vice President
Point Beach Nuclear Plant

Subscribed to and sworn before me
on this 17th day of December, 1999

Christine K. Pozorski
Notary Public, State of Wisconsin

My Commission expires on 8/25/2002.

MAW/tat

Attachments

cc: NRC Regional Administrator
NRC Resident Inspector
NRC Project Manager
PSCW

Corrections to Attachment 2 “Safety Evaluation” of TSCR 210

Replace Section 5.3 “Long Term LOCA/Containment Integrity Analysis” on page 57 with the following:

The current licensing basis⁽⁴³⁾ considered an initial pressure of 2250 psia plus uncertainty and an initial power of 1518.5 MWt plus 2% uncertainty, which have not changed for this evaluation. However, both the core stored energy and initial operating temperature have changed and must be evaluated against the current licensing basis. The current licensing basis is Tav_g of 577.9°F (573.9°F design Tav_g plus 4°F uncertainty) and a core stored energy of 5.77 full power seconds (FPS) (based on 0.400 inch rod OD, 1518.5 MWt core power, PAD version 3.3). This evaluation assumes a Tav_g of 580°F (574°F design Tav_g plus 6°F uncertainty) and a core stored energy of 4.68 full power seconds (based on 0.422 inch rod OD, 1650 MWt core power, PAD version 3.4). The increase in RCS average temperature will result in a greater release of energy to the containment, but this is offset by the reduction in core stored energy from 5.77 to 4.68 FPS. Therefore, the current licensing basis remains bounding.

Add new Reference 43 to page 73 as follows:

43. Letter from J. Bugica (Westinghouse) to T. Pridgeon (WEPCO), “Wisconsin Electric Power Company, Point Beach Units 1 & 2, Containment Analysis Assuming Reduced Fan Cooler Performance,” WEP-97-522, May 29, 1997.

Delete the word “fresh” in the last sentence of the first paragraph of page 76 as follows:

The results of this assessment indicate that the Best-Estimate analysis with a full core of 422V+ fuel for the PBNP bounds the transition core cycles.

Replace Reference 13 on page 77 with the following:

13. “Application of Best Estimate Large Break LOCA Methodology to Westinghouse PWRs with Upper Plenum Injection,” WCAP-14449-P-A (Proprietary), Revision 1, October 29, 1999.

Delete Reference 14 on page 77. As a result, change the wording in the last two sentences of the first paragraph on page 74 as follows:

Old wording:

The NRC Safety Evaluation Report (SER) (Reference 13), gives approval for use of BE UPI methodology. The SER, along with revisions based on the RAIs (Reference 8), and SER Limits (Reference 12), are incorporated into the soon to be approved version of WCAP-14449-P-A (Reference 14).

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Attachment 1 – TSCR 210 Attachment 2 Replacement Sections

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New wording:

The NRC Safety Evaluation Report (along with revisions based on the RAIs (Reference 8) and SER Limits (Reference 12)) gives approval for use of the BE UPI methodology, and is incorporated in WCAP-14449-P-A (Reference 13).