April 11, 2000

Mr. Michael B. Sellman
Senior Vice President and
Chief Nuclear Officer
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, WI 53201

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION ON TECHNICAL SPECIFICATION CHANGE REQUEST 201 (TAC NOS. MA6846 AND MA6847)

Dear Mr. Sellman:

By letter dated October 5, 1999, the Wisconsin Electric Power Company submitted a license amendment request for the Point Beach Nuclear Power Plant, Units 1 and 2, to revise Technical Specifications (TSs) 15.3.1.A.3, 15.3.3.A, and 15.3.3.C. The amendment was submitted to eliminate inconsistencies within the TSs pertaining to certain plant components necessary for decay heat removal. Based upon our review of your submittal, the staff has developed the enclosed request for additional information.

The enclosed request was discussed with Mr. Jack Gadzala and other members of your staff during a conference call on March 20, 2000. A mutually agreeable target date of 60 days from the date of this letter for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-1355 at the earliest opportunity.

Sincerely,

/RA/

Beth A. Wetzel, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure: Request for Additional Information

cc w/encl: See next page

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DATE	4/10/00	4/7/00	4/10/00

ACCESSION NO. ML003701267

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REQUEST FOR ADDITIONAL INFORMATION

TECHNICAL SPECIFICATION CHANGE REQUEST 201

1. TS 15.3.1.A.1.b requires that when the reactor is subcritical and $T_{avg} \geq 350\ ^{o}F$, both reactor coolant (RC) loops shall be operable and at least one RC loop shall be in operation. TS 15.3.1.A.1.b is consistent with STS (Westinghouse Standard Technical Specifications, NUREG-1431, Revision 1) 3.4.5.b that requires two RC loops be operable and one RC loop be in operation when the rod control system is not capable of rod withdrawal.

   STS 3.4.5.a also specifies that two RC loops shall be operable and in operation when the rod control system is capable of rod withdrawal. The staff finds that TS 15.3.1.A.1.b does not include STS 3.4.5.a and its associated action items for conditions with the rod control system being capable of rod withdrawal. Provide the technical bases for not including STS 3.4.5.a in the proposed TS.

2. TS 15.3.1.A.1.b(1) specifies that when the reactor is subcritical and $T_{avg} \geq 350\ ^{o}F$, both reactor coolant pumps (RCPs) may not be in operation with certain operating conditions met. This TS is partially compliant with the note to STS 3.4.5, which allows both RCPs to be not in operation for up to 1 hour per 8-hour period. However, TS 15.3.1.A.1.b(1) deviates from STS 3.4.5 in that it does not specify the time period to de-energize the required RCPs for performing the desired tests. Provide justification for the deviation.

3. TS 15.3.1.A.3.a(1) requires that for $200\ ^{o}F < T_{avg} < 350\ ^{o}F$, at least two of the residual heat removal (RHR) methods shall be operable and at least one shall be in operation. This TS is consistent with STS 3.4.6. When TS 15.3.1.A.3.a(1) is not met, TS 15.3.1.A.3.a(2), consistent with STS 3.4.6.C, requires corrective actions be taken for conditions with no RHR methods operable or in operation, and TS 15.3.1.A.3.a(3), consistent with STS 3.4.6.A, requires corrective actions be taken for conditions with only one RHR method operable. Following TS 15.3.1.A.3.a(2) and (3), the operator is allowed to continuously operate the plant in a reactor coolant temperature range of $200\ ^{o}F < T_{avg} < 350\ ^{o}F$ with the RHR requirements in TS 15.3.1.A.3.a(1) being not met.

   However, STS 3.4.6.B requires that the reactor be placed to Mode 5 ($T_{avg} \leq 200\ ^{o}F$) if one RHR loop is operable and two are RCS loops inoperable. As stated in STS B3.4.6.B.1, bringing the reactor to Mode 5 is a conservative action with respect to RHR. With only one RHR loop operable, redundancy for RHR is lost and, in the event of a loss of the remaining RHR loop, it would be safer to initiate the loss from Mode 5 ($T_{avg} \leq 200\ ^{o}F$) rather than Mode 4 ($200\ ^{o}F < T_{avg} < 350\ ^{o}F$.) The staff finds that TS 15.3.1.A.3.a does not include STS 3.4.6.B. Provide technical bases for not including STS 3.4.6.B in the proposed TS.

4. TS 15.3.1.A.3.b(b) requires that for plant conditions with reactor coolant loops filled and reactor coolant temperature of no less than $200\ ^{o}F$, a steam generator secondary side water level should maintain at level no less than 30 percent (narrow range) in one steam generator. This requirement is consistent with STS 3.4.7.b. However, 30-percent water level is a plant-specific number and should be supported by the plant-specific analyses.

ENCLOSURE

Provide the results of the analyses to show that the water level of 30 percent is sufficient to ensure adequate decay heat removal capability during natural circulation conditions.

The requested information should include a discussion of acceptability of the methods used for the analyses.

5. TS 15.3.1.A.3.b(3) allows all required RHR pumps to be not in operation for up to 1 hour in any 8-hour period when T_{avg} is $\leq$ 200 ^{o}F and certain operating conditions are met. This is consistent with STS 3.4.7, Note 1, which is applicable to Mode 5 ($T_{avg} \leq$ 200 ^{o}F) with the RCS filled with water. However, TS 15.3.1.A.3.b(3) is applicable to Mode 5 with the RCS either filled or not filled with water. With RC loops not filled, Note 1 of STS 3.4.8 allows the required RHR pumps to be not in operation for up to 15 minutes when switching from one loop to another.

   During operations with the reduced RCS inventory, the inadvertent drainage or a loss of RHR capability is more likely to occur because the plant conditions are more likely to be perturbed due to various outage maintenance activities. STS 3.4.8, Note 1 is to limit the likelihood of a loss RHR capability for transient mitigation. The staff finds that TS 15.3.1.A.3.b(3) deviates from the STS in that it does not include STS 3.4.8, Note 1. Provide justification for the deviation.