June 21, 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 RE: SECTION 3.8 OF IMPROVED TECHNICAL SPECIFICATIONS CONVERSION (TAC NOS. MA7186 AND MA7187)

Dear Mr. Sellman:

By letter dated November 15, 1999, the Wisconsin Electric Power Company submitted a license amendment request to convert the current Technical Specifications to improved Technical Specifications for Point Beach, Units 1 and 2.

The enclosed request was discussed with Mr. Tom Malanowski and other members of your staff during a conference call on May 17, 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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REQUEST FOR ADDITIONAL INFORMATION

POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2

IMPROVED TECHNICAL SPECIFICATIONS (ITS), SECTION 3.8

ITS 3.8.1, AC Sources - Operating

3.8.1-1 CTS 15.3.7.A.1.a, 15.3.7.B.1.a
DOC LA.1

The current Technical Specification (CTS) requires at least two 345 KV transmission lines to be in service, and includes actions to be taken if this requirement is not met. The proposed ITS deletes these CTS requirements using DOC LA.1 as justification. It is the staff's view that DOC LA.1 does not provide an adequate justification for this deletion. Simply stating that these CTS only provide details that are not directly pertinent to the actual requirements is not adequate. The licensee is requested to provide a more detailed discussion on why the CTS requirements and associated actions are not being retained.

Licensee Response:

3.8.1-2 CTS 15.3.7 A.1.b
DOC L.9

The proposed 24-hour Completion Time for verifying the gas turbine is operating or that the opposite unit's x03 transformer is supplying power is a beyond-scope issue which is undergoing a separate review.

Licensee Response:

3.8.1-3 CTS 15.3.7.A.1.i
DOC A.6

The CTS requires that the 4160v and the 480v safeguards buses be energized from their normal supply. The proposed ITS, as reflected in Insert 3.8.1-1, only addresses safeguards buses to the 4160v level. What is the justification for deleting the CTS requirement regarding the 480v safeguards buses.

Licensee Response:

ENCLOSURE

3.8.1-4 CTS 15.3.7.B.1.a
DOC LA.1

The CTS includes a requirement to decrease reactor power to 50 percent if one 345KV line is lost, and to limit reactor operation to supplying auxiliary load if all 345 KV lines are lost. This CTS requirement is not being retained in the ITS. DOC LA.1 does not provide an adequate justification for deleting this CTS item. The licensee is requested to provide a detailed justification for the deletion, including a discussion of why the requirement is included in CTS and why deletion is acceptable. This may also be a beyond-scope item.

Licensee Response:

3.8.1-5 CTS 15.3.7B.1.c
DOC L.2

This proposed change is a subset of beyond-scope item No. 79.

Licensee Response:

3.8.1-6 CTS 15.3.7B.1.c
DOC M.1

DOC M.1 appears to be acceptable as far as it goes. However, it does not appear to be applicable to deleting the CTS requirement to shutdown the reactor associated with an out-of-service 13.8/4.16KV transformer. The licensee should revisit this proposed change and provide the proper justification for the deletion. DOC M.1 is acceptable with respect to adding Insert 3.8.1-3.

Licensee Response:

3.8.1-7 CTS 15.3.7B.1.f
DOC L.4, L.6, and A.11

The proposed ITS includes LCO 3.8.1, Condition C. This condition would allow buses A05 and A06 in the same unit, or buses 1A05 and 2A06 to be without offsite power for 24 hours. Neither of these plant conditions is allowed by the CTS, and represent a less restrictive change. It is the staff's view that the DOCs associated with this change do not provide an adequate justification for the change. The justifications provided paraphrase the NUREG Bases, but fail to address why the change is acceptable from a plant-risk perspective. The licensee is requested to revisit the proposed change with a view towards providing a more adequate justification.

Licensee Response:

3.8.1-8 Proposed ITS 3.8.1, Condition D
Insert 3.8.1-5

The Note included in proposed Condition D regarding separate condition entry for each inoperable offsite power source is not acceptable.

Licensee Response:

3.8.1-9 Proposed ITS Condition C, D, E, and F
Insert 3.8.1-4 and Insert 3.8.1-5, Bases Table 3.8.1-1

The proposed Conditions, to a large extent, reflect the CTS. Proposed Bases Table 3.8.1-1 addresses allowable offsite and onsite power inoperabilities. However, as stated, the proposed ITS would allow combinations of offsite and onsite power inoperabilities that are not allowed by the CTS. The DOCs associated with these proposed changes do not adequately address why the changes are acceptable. The licensee is requested to provide a justification for these combinations of inoperabilities, or revise the ITS to preclude them. Some of the identified combinations are as follows:

- inoperable offsite to 1A05 and 2A05, with inoperable DGs G03 and G04
- inoperable offsite to 1A06 and 2A06, with inoperable DGs G01 and G02
- inoperable offsite to 1A05 and inoperable DGs G02 and G03
- inoperable offsite to 2A06 and inoperable DGs G02 and G03

All of the above combinations would be allowed to exist for 7 days. These are combinations the staff has identified to date. There may be others.

Licensee Response:

3.8.1-10 CTS Bases Page 15.3.7-8
DOC A.5

The CTS Bases discussion regarding having only one 345KV transmission line appears to have been deleted from the ITS Bases. DOC A.5 does not provide an adequate justification for this change. This is a subset of RAI 3.8.1-1.

Licensee Response:

3.8.1-11 CTS Bases Pages 15.3.7-9, CTS 15.3.7.B.1.b
DOC A.5, M.8

In the event of a loss of both 345/13.8KV transformers, the CTS requires one unit to shut down and the second unit to reduce power to no more than 50 percent. Since the CTS does not specify a time, it is assumed the actions are required immediately. In the proposed ITS, this requirement is deleted. The ITS will allow operation of both units at 100-percent power for up to 24 hours. It is the staff's view that DOCs A.5 and M.8 do not provide an adequate

justification for this change. The purpose of this comment is to advise that this change will be reviewed as part of the overall change covered by beyond-scope Item No. 79.

Licensee Response:

3.8.1-12 CTS 15.4.6A.2
DOC L.7

The licensee is requested to provide a discussion on how a "simulated" interruption of offsite power is accomplished such that the emergency bus sees zero voltage and load shedding initiated.

Licensee Response:

3.8.1-13 CTS 15.4.6A.2
DOC M.6

The CTS requires conducting this surveillance "during reactor shutdown." This requirement is not reflected in ITS SR 3.8.1.5, and DOC M.8 does not provide a justification for the deletion. The licensee is requested to provide a justification, or retain the requirement in the ITS.

Licensee Response:

3.8.1-14 CTS 15.4.6A.3
DOC LA.3

It is the staff's view that DOC LA.3 does not provide an adequate justification for deletion of this CTS surveillance. Would it not be better to state that this surveillance requirement (SR) will be performed automatically every 18 months as a function of the AC loss of offsite power test? When AC power is interrupted, DC power is the only power source available until the diesel generators (DGs) start and load. During this period, the DC emergency lights should come on, and this function can be observed.

Licensee Response:

3.8.1-15 CTS 15.6.4A.4
DOC LA.4

The licensee has proposed to remove the CTS requirement to inspect the DG from the ITS. Per DOC LA.4, this requirement would be retained in procedures. The staff does not consider this to be acceptable. In past conversions, this inspection requirement has been relocated to

the Final Safety Analysis Report, Technical Requirements Manual, or other document which is controlled under 10 CFR 50.59. The licensee is requested to revise the submittal to reflect relocation of this CTS requirement as discussed herein.

Licensee Response:

3.8.1-16 Bases Insert B3.8.1-2

The LCO description provided in the above insert does not agree with the actual LCO. The LCO addresses using the opposite unit's X03 transformer and the gas turbine. The Bases do not include a discussion of this. This is an inconsistency that must be resolved. The inconsistency includes the discussion of both the associated unit and the opposite unit offsite power.

Licensee Response:

3.8.1-17 ITS LCO 3.8.1, Condition A

Required Actions A.1 and A.2 address the opposite unit's X03 transformer and the gas turbine, respectively. This appears to be redundant to the LCO, since the plant condition addressed in Actions A.1 and A.2 is specifically allowed by the LCO. This is potentially confusing. Consideration should be given to revising the LCO to be consistent with the Bases discussion as the normal power alignment, and the allowed alternate alignment addressed in Required Actions A.1 and A.2.

Licensee Response:

3.8.1-18 ITS LCO 3.8.1, Conditions B and C

The staff does not see any significant difference between Condition B and the first part of Condition C. If the X04 transformer is inoperable, the A05 and A06 buses will be without offsite power. Therefore, these Conditions could be combined into one. The Bases discussion for Condition B would cover this combined Condition. Inoperable offsite sources to 1A05 and 2A06 is a different situation than no offsite to A05 and A06 of the same unit, and required a different Bases discussion. The Bases discussion for Required Action C.1 could cover this. The licensee is requested to consider the staff's comments.

Licensee Response:

3.8.1-19 ITS LCO 3.8.1 Bases
Insert B3.8.1-4

The Note regarding separate condition entry for offsite circuits is not acceptable.

Licensee Response:

3.8.1-20 Bases Markup Page B3.8.1-6

In the third paragraph, there is wording regarding redundant features "associated with the other train." For Point Beach, this appears to be incorrect. Considering the plant design, this wording should be changed to reflect the plant design.

Licensee Response:

3.8.1-21 Bases Markup Page B3.8.1-9

Paragraph b. at the top of the page addresses "A required feature on the other train." At Point Beach, the redundant required features could be on any of the other trains in both units. The Bases discussion should be revised to reflect this. Also, in one place on this page, the term "standby emergency power source" is proposed to be inserted. In this case, the term should be plural (i.e., "sources").

Licensee Response:

ITS 3.8.2, AC Sources - Shutdown

3.8.2-1 CTS Markup
Insert 3.8.2-1

CTS does not have a specific shutdown TS. Therefore, if a system/component is required to be OPERABLE in Modes 5 and 6, by the CTS definition of OPERABILITY, its associated offsite and onsite power sources must also be OPERABLE. If more than one train of system/components are required to be OPERABLE, then multiple trains of offsite and onsite power must also be OPERABLE. The proposed ITS only requires one offsite and one onsite power source, regardless of the number of systems/components required to be OPERABLE. The ITS appears to be less restrictive than the CTS, and this change has not been adequately justified.

Licensee Response:

3.8.2-2 CTS Markup
Insert 3.8.2-1

The requirements for offsite power in this LCO are expressed in terms of the 480V safeguards buses B03 and B04. In LCO 3.8.1, the offsite power requirements are expressed in terms of the 4.16KV buses. Why is there a difference? In the staff's view, the requirements should be the same. The licensee is requested to provide a discussion on why the difference is considered appropriate, or modify the submittal so LCO 3.8.1 and LCO 3.8.2 have similar requirements. The staff is particularly interested in why the 480V safeguards buses are not addressed in LCO 3.8.1.

Licensee Response:

3.8.2-3 Bases Markup
Insert 3.8.2-2

The proposed Bases discussion of the offsite circuits includes a reference to utilizing either unit's 4.16KV safeguards buses A05 and A06. The staff is aware that the standby emergency power sources can be connected to more than one A05 or A06 bus, but is not aware of cross connecting offsite power sources at this level. The licensee is requested to explain if, and how, the A05 and A06 buses can be cross-tied for the purpose of providing offsite power, and what restrictions are applicable to such cross-tying.

Licensee Response:

3.8.2-4 Bases Markup
Insert 3.8.2-5

There seems to be something missing in the third paragraph of the Bases discussion for SR 3.8.2.2. The discussion skips from stating that the standby emergency power source must be capable of starting and accepting loads to a discussion of limited AC sources available. Something is missing between these two parts of the Bases. The licensee is requested to revise the Bases to provide the missing material.

Licensee Response:

3.8.2-5 Bases Markup
Insert 3.8.2-5

Consideration should be given to revising this SR and associated Bases. The proposed ITS do not include any requirement to load the standby emergency power sources. Consequently, it is doubtful that enough fuel would be consumed during the test to cause the fuel oil transfer

system to automatically start and replenish the day tanks. As written, it may be difficult to comply with this ITS requirement in Modes 5 and 6.

Licensee Response:

ITS 3.8.3, Diesel Fuel Oil, Lube Oil, and Starting Air

3.8.3-1 NUREG Markup
Insert 3.8.3-1

LCO 3.8.3 is proposed to be changed for the ITS. The staff does not understand the rationale for the change. ITS SR 3.8.3.3 requires verifying the air start bottle bank pressure is greater than 165 psi. If the pressure is not at or above this limit, the system and associated diesel are inoperable. Given that a pressure limit is involved, why not use the NUREG format and state the LCO and applicable Condition in terms of this limit instead of the proposed "inoperable starting air system."

Licensee Response:

3.8.3-2 Bases Markup Page B3.8.3-6, B3.8.3-7

Section 5 of the NUREG and the ITS does not have a Bases. That is why the details of the Fuel Oil Test program are included in the 3.8.3 Bases. The submittal should be revised to retain a discussion of the program in the 3.8.3 Bases.

Licensee Response:

ITS 3.8.4, DC Sources - Operating

3.8.4-1 CTS Markup
Insert 3.8.4-1 Actions Note

It is the staff's position that placement of the Note regarding entry into LCO 3.8.9 in the proposed location is not acceptable. The Note, when applicable, should be placed in the Required Actions column of the appropriate Condition.

Licensee Response:

3.8.4-3 NUREG Markup SR 3.8.4.1
JFD 03

This JFD states that the batteries at Point Beach have different voltages (i.e., 128V and 130.2V). However, there is only one swing battery. What is the voltage of the swing battery? If is 130.2V, explain how this is acceptable as a substitute for a 128V battery. If it is 128V, explain how this is acceptable as a substitute for a 130.2V battery.

Licensee Response:

3.8.4-4 NUREG Bases Markup
Insert B3.8.4-2

In this Bases discussion, it is stated that: (1) swing charger D09 is connected to Bus D301 and can provide power to buses D01 and D02, (2) swing charger D109 is connected to bus D302 and can provide power to buses D03 or D04, and (3) swing battery D305 can be aligned to any of the four DC buses. Given the above, what battery charger is used to maintain swing battery D305 in a fully charged state when the battery is aligned to bus D03 or D04?

Licensee Response:

ITS 3.8.5, DC Sources - Shutdown

3.8.5-1 Insert 3.8.5-1

The staff is somewhat confused regarding how LCO 3.8.5 is intended to function. It is the staff's understanding that the DC electrical power subsystems at Point Beach are shared between the two units, and that all four subsystems are required to be OPERABLE when either unit is at power. Given this, when one unit is in shutdown, what LCO is applicable to the DC subsystems? Is it LCO 3.84, or LCO 3.85? LCO 3.8.4 has one set of requirements for an inoperable DC subsystem, while LCO 3.8.5 has another set of requirements. The licensee is requested to provide a discussion regarding how LCO 3.8.5 is intended to work in light of the fact that the DC subsystems are shared.

Licensee Response:

3.8.5-2 NUREG Bases Markup

The proposed ITS Bases are identical to the NUREG Bases with some minor exceptions. The proposed Bases do not appear to reflect the Point Beach design which includes shared DC Subsystems. It appears that the Bases will require some additional work.

Licensee Response:

ITS 3.8.7, Inverters - Operating

3.8.7-2 Clarification

The licensee is requested to expand on the discussion of AC vital buses contained in the Bases for LCO 3.8.7. Specifically, the staff would like to know how the buses are arranged and how they are powered from the inverters. Of the 16 buses, are there 4 red, 4 yellow, etc.? Are there 4 buses per channel, one each of red, yellow, white, and blue? Or are the buses in a channel all the same color? Within the groups on each channel, it is indicated that one group serves Unit 1 and the other group serves Unit 2. Are the inverters arranged such that the failure of the inverter serving a Unit 1 group would not impact on the Unit 2 group? A detailed drawing would be helpful.

Licensee Response:

3.8.7-3 CTS 15.3.7A.1.h

The CTS requires eight AC vital buses to be OPERABLE. The proposed Bases discussion identifies 16 AC vital buses and 8 inverters. Proposed ITS LCO 3.8.7 requires four inverters to be OPERABLE. The licensee is requested to explain the interrelationship of these different requirements and discussions. This is a subset of RAI 3.8.7-2, above.

Licensee Response:

ITS 3.8.8, Inverters - Shutdown

3.8.8-1 Insert 3.8.8-1

Proposed LCO 3.8.8 requires AC vital buses to be OPERABLE as required by LCO 3.8.10. However, LCO 3.8.7 requires four AC vital buses to be OPERABLE. In the event that one is unit shut down and one unit is at power, which one of these two LCOs takes precedence? This is the same problem that exists with LCO 3.8.2 and LCO 3.8.5.

Licensee Response:

ITS 3.8.9, Distribution Systems - Operating

3.8.9-1 Insert 3.8.9-2

In the proposed ITS LCO 3.8.9, Condition A, the Required Action is to declare the affected equipment inoperable. In the staff's view, this is redundant. If the power to any system/component is removed, it is obvious that the system/component is inoperable. Therefore, it seems that having a distribution section in the Point Beach ITS is unnecessary. As discussed in other RAIs, a distribution section may well cause confusion and conflict. In light of this, the staff suggests that the distribution section be deleted from the Point Beach ITS. The staff recognizes that the licensee is attempting to follow NUREG-1431. However, it should be noted that the Required Actions and associated Completion Times in NUREG-1431 LCO 3.8.9 are more restrictive than would be the Required Action and Completion Times associated with the systems/components made inoperable by the de-energized electrical bus. Without these more restrictive requirements, there would be no need for LCO 3.8.9. Since the proposed ITS LCO 3.8.9 does not impose any more restrictive requirements, it can be deleted.

Licensee Response: