



MARK E. REDDEMANN
Site Vice President
Point Beach Nuclear Plant
6610 Nuclear Rd.
Two Rivers, WI 54241
Phone 920-755-7627

NPL 2000-0352

August 3, 2000

10 CFR 50.90

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Stop P1-137
Washington, DC 20555

Ladies and Gentlemen:

DOCKETS 50-266 AND 50-301
SUPPLEMENT 1 TO LICENSE AMENDMENT REQUEST 220
DELETION OF LICENSE CONDITION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On May 19, 2000, Wisconsin Electric Power Company (WE), licensee for the Point Beach Nuclear Plant (PBNP), submitted a proposal to amend Facility Operating Licenses DPR-24 and DPR-27 for PBNP Units 1 and 2, respectively (reference letter NPL 2000-0221). The purpose of the proposed amendments was to delete a license condition, from Appendix C to the licenses, regarding compliance with GDC 19 dose limits and associated implementation dates. The amendments were submitted in response to a NRC letter dated April 7, 2000.

The NRC staff's April 7, 2000, letter also communicated the expectation that WE continue to meet certain commitments made in our June 13, 1997 letter (NPL 97-0351). These commitments included periodic inspections and tests of the Emergency Core Cooling System (ECCS) and control room ventilation system, above and beyond those required by Technical Specifications, to provide additional assurance that control room operator dose remain within GDC 19 dose limits (with reliance on KI). Subsequently, in our February 26, 1998, request for amendments (and revised control room radiological dose analyses), we communicated our plan to discontinue these additional inspections and tests upon approval of the requested amendments based on an overall reduction in the allowable containment leakage from 0.4 to 0.2 weight percent per day (La).

WE informed the commission by letter dated February 24, 1999, that this reduced containment leakage limit had been administratively implemented within the PBNP Containment Leakage Rate Test Program, thereby obviating the need for the commitments that were made in our June 13, 1997, letter. Therefore, the commitments in our June 13, 1997, letter were discontinued.

During a phone call with Claudia Craig, *et al*, of the NRC Staff on August 1, 2000, WE was requested to provide additional information regarding the discontinuance of these commitments. This information follows.

A001

The six original commitments were evaluated and dispositioned as stated below:

- 1) Performance of monthly leakage inspections of accessible portions of the emergency core cooling systems (ECCS) outside containment that could contain recirculated fluid from the containment during a loss-of-coolant accident.

During performance of these inspections, no abnormal indications of leakage had been noted. The ECCS systems are normally in a standby condition and therefore were not usually at operating pressure during the inspections. Also, these inspections are redundant to the normal shift operator rounds. Consequently, minimal benefit resulted from these additional inspections and they were discontinued after the commitment was changed.

- 2) Inspecting accessible, pressurized ECCS piping outside containment during quarterly inservice testing.

We consider these inspections to be appropriate to the conduct of the associated inservice testing and have therefore continued to perform them irrespective of the commitment change. The applicable inservice test procedures (IT-01 through IT-06) direct the conduct of these inspections.

- 3) Performance of the leakage reduction and preventive maintenance program tests for the ECCS during any cold shutdown outage of sufficient duration (about 5 days or longer) in which 6 months or more has elapsed since the last testing.

This is an extensive series of 10 tests requiring about 80 hours to complete and necessitating entry into Technical Specifications limiting conditions for operation. Much of the value of these tests is available from the inspections performed during quarterly inservice testing described in item 2 above. This commitment also created significant potential for unnecessarily extending the duration of an unplanned unit outage. Our evaluation concluded that there was no net benefit to safety in the performance of these tests and they were discontinued after the commitment was changed.

- 4) Performance of corrective action based on the results of these inspections and tests to ensure ECCS leakage remains as low as reasonably achievable.

This commitment was duplicative of the regulatory guidelines contained in NUREG 0578, "TMI-2 Lessons Learned Task Force, Status Report and Short Term Recommendations". Additionally, this commitment essentially duplicated the requirements of 10 CFR 50, Appendix B, Criterion XVI, "Corrective Actions", which directs that conditions adverse to quality are promptly identified and corrected. Therefore, we believe that the actions intended by this commitment are sufficiently embodied in the regulations such as to not require a duplicative commitment.

- 5) Performance of periodic inspections of the control room ventilation system to verify adequacy of material condition.

We consider periodic inspections of the control room ventilation system to be appropriate to the assurance of quality and therefore continue to perform them. These inspections are proceduralized

within Technical Specification surveillance test TS-9. This monthly procedure requires a system engineer walkdown of accessible portions of the system for material condition. We also perform annual preventive maintenance to inspect the material condition of system dampers and duct access doors. In addition, Technical Specification required surveillances are performed in accordance with Technical Specification 15.4.11, "Control Room Emergency Filtration," and as needed following system maintenance and testing.

- 6) Increased testing of the control room ventilation system filters to approximately 6-month intervals.

This significant test involves contracting with an external testing agency and necessitates entry into a Technical Specification limiting condition for operation. The contracting cost alone is several thousand dollars. Evaluation of the test results for control room ventilation system filter surveillance at PBNP revealed no pattern of filter degradation (bypassing and carbon iodine removal efficiency), neither during the 6-month intervals nor during the previous annual test intervals. The system is normally operated in a mode that does not degrade filter performance. Administrative controls ensure that contaminants are not introduced into the F-16 carbon bank during normal operation, which lessens the potential for unexpected filter performance degradation. Based on this, our evaluation concluded that there was no net benefit to safety with the increased frequency of these tests. Therefore, performance of the test was returned to an annual frequency after the commitment was changed.

As stated in our February 24, 1999, letter, the reduced containment leakage limit (0.2 La) has been implemented within the PBNP Containment Leakage Rate Test Program. Our assessment concluded that the additional assurance (that the regulatory requirements for control room operator dose are met) provided by adoption of this reduced La limit was likely more effective than the additional assurance that had been cumulatively provided by the original six commitments. Consequently, these six commitments in our June 13, 1997, letter have been superseded by the reduced La limit. Implementation of the lower containment leak rate provides additional assurance that the predicted dose under the current large break loss of coolant analysis would be substantially lower. The lower leakage limit is one-half that assumed in our analysis of record. This overall reduction in allowed containment leakage, in conjunction with the Technical Specification required surveillances, provides adequate assurance that operator dose will remain within GDC 19 dose limits based on the assumptions in our dose analysis of record. Therefore, the intent of the original commitments continue to be met. We will maintain this reduced leakage limit (0.2 La) pending submittal of a revised radiological dose analyses for the control room as discussed in our May 19, 2000, letter.

An additional clarification requested by the NRC staff concerned the conditions under which the use of Potassium Iodide (KI), as a prophylaxis measure, would be implemented to ensure that operator dose remained within regulatory limits. The current licensing basis analysis for radiological consequences for the control room was submitted in support of Amendments 174 and 178 for PBNP Unit 1 and Unit 2, respectively, issued on July 9, 1997. These analyses demonstrated, and the staff concluded, that there was reasonable assurance that the dose limits presented in 10 CFR 100 (offsite) and GDC-19 (control room) would not be exceeded. The staff's confirming evaluation determined that the radiological consequences at the Exclusion Area Boundary and Low Population Zone were within the acceptance criteria presented in SRP 15.6.5, Appendices A and B of NUREG-0800. Radiological doses to the

control room operators were within the acceptance criteria of SRP 6.4 of NUREG-0800, based on the control room operators taking KI tablets in the event of a large break LOCA. Administration of KI is credited for reducing calculated thyroid dose by a factor of ten. While control room operators would be directed to use KI tablets in the event of a large break LOCA if radiological conditions warranted, operators' use of KI is not limited to this specific accident. Rather, the use of KI is based on the radiological conditions resulting from a particular accident. Point Beach Emergency Plan Implementing Procedures direct the use of KI based on dose projections. Therefore, operators would be directed to use KI tablets in the event of any accident where dose projections would warrant their use.

We have determined that this additional information for the proposed amendments does not involve a significant hazards consideration, authorize a significant change in the types or total amounts of effluent release, or result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, we conclude that the proposed amendments meet the categorical exclusion requirements of 10 CFR 51.22(c)(9) and that an environmental impact appraisal need not be prepared.

If you have any questions or require additional information, please contact us.

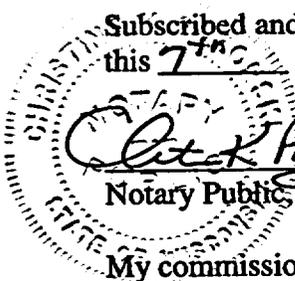
Sincerely,

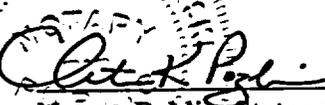


Mark E. Reddemann
Site Vice President
Point Beach Nuclear Plant

JG/tat

Subscribed and sworn before me on
this 7th day of August, 2000.



 Christine K. Pozorski
Notary Public, State of Wisconsin
My commission expires 8/25/2002.

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