November 20, 2000

Mr. Mark Reddemann
Site Vice President
Point Beach Nuclear Plant
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RE: SECTION 1.0 OF IMPROVED TECHNICAL SPECIFICATIONS CONVERSION (TAC NOS. MA7186 AND MA7187)

Dear Mr. Reddemann:

By letter dated November 15, 1999, the licensee 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. Jack Gadzala during a conference call on October 5, 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,

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

November 20, 2000

Mr. Mark Reddemann
Site Vice President
Point Beach Nuclear Plant
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RE: SECTION 1.0 OF IMPROVED TECHNICAL SPECIFICATIONS CONVERSION (TAC NOS. MA7186 AND MA7187)

Dear Mr. Reddemann:

By letter dated November 15, 1999, the licensee 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. Jack Gadzala during a conference call on October 5, 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

DISTRIBUTION

PUBLIC	RBouling	LBerry
PDIII-1 Reading	OGC	KKavanaugh
SBlack	ACRS	
CCraig	CHarbuck, TSB	
BWetzel	RLanksbury, RIII	

OFFICE	PDIII-1/PM	PDIII-1/LA	PDIII-1/SC
NAME	BWetzel	RBouling	CCraig
DATE	11/21/00	11/20/00	11/21/00

Accession No. ML003770210

OFFICIAL RECORD COPY

Point Beach Nuclear Plant, Units 1 and 2

cc:

Mr. John H. O'Neill, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW
Washington, DC 20037-1128

Mr. Richard R. Grigg
President and Chief Operating Officer
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, WI 53201

Site Licensing Manager
Point Beach Nuclear Plant
Nuclear Management Company, LLC
6610 Nuclear Road
Two Rivers, WI 54241

Mr. Ken Duveneck
Town Chairman
Town of Two Creeks
13017 State Highway 42
Mishicot, WI 54228

Chairman
Public Service Commission
of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
6612 Nuclear Road
Two Rivers, WI 54241

Ms. Sarah Jenkins
Electric Division
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Michael D. Wadley
Chief Nuclear Officer
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

Nuclear Asset Manager
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, WI 53201

REQUEST FOR ADDITIONAL INFORMATION

POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2

SECTION 1.0 OF IMPROVED TECHNICAL SPECIFICATIONS (ITS)

1.0-1 DOC A2
CTS 1.15, Definition of Operability
CTS 3.0.D
ITS Definition of Operability

The CTS operability definition requires operability of both normal power (offsite, including the gas turbine generator, via an X04 transformer) and emergency power (from the normal diesel generator) for a specified component to be operable. DOC A2 incorrectly explains this is negated by the provision of CTS 3.0.D, which only requires either normal or emergency power (not both), but only under certain conditions (all redundant power sources must be operable; i.e., they all have both normal and emergency power). The ITS only requires one AC source (normal or emergency) and does not require satisfying any conditions. ITS 3.8.1, "AC Sources - Operating," imposes conditions similar to CTS 3.0.D in the event a single AC source is inoperable by requiring cross-train checks. **Comment**: Adoption of the STS operability definition is a relaxation of the CTS electrical power requirement for operability. Revise the submittal with an L-type change classification, justification, and no significant hazards consideration determination analysis.

Licensee Response:

1.0-2 JFD 8, DOC A7
CTS, ITS, and STS definitions of Shutdown Margin

The ITS proposes to explicitly exclude accounting for the highest worth rod cluster control assemblies (RCCA) being fully withdrawn from the core in the case where all the RCCAs, including any that cannot be moved, are fully inserted. The reason is that the CTS does not require this and it would be overly conservative. Actually, the CTS is silent about this situation, and thus, is ambiguous. The STS would require this assumption in this situation. Deviating from the STS definition, as proposed, would be generic because the basis for it is not tied to the plant design. In addition, staff considers this CTS change involving a deviation from the STS to be beyond scope. It is therefore assigned as beyond-scope item 98. **Comment:** Adopt the wording of the STS shutdown margin definition.

Licensee Response:

ENCLOSURE

1.0-3 DOCs A8 and A11
CTS definition of Power Operation
CTS definition of Low Power Operation
ITS and STS definitions of Mode 1, Power Operation, and Mode 2, Startup

(a) The CTS defines Power Operation as critical with indicated power at >2% rated power. The ITS and STS define Mode 1, Power Operation, as $K_{eff} \geq 0.99$ and indicated power level as > 5% of rated thermal power (RTP), excluding decay heat (which can vary from negligible to 7% RTP, based on the unit's preceding power history). DOC A8 does not explain how 5% RTP, excluding decay heat, is equivalent to 2% rated power (also excluding decay heat, based on industry and Point Beach's current practice). If they are not really equivalent, then this change may not be administrative. It appears that, at the very least, the scope of Mode 1 has decreased because 5% RTP is not the same as 2% rated power.

(b) The same issue occurs in DOC A11 for the CTS definition of Low Power Operation and the ITS definition of Mode 2, whose scope appears to have increased.

(c) Also, the CTS defines Reactor Critical as $K_{eff} = 1.0$, while the ITS definitions of Modes 1 and 2 use $K_{eff} \geq 0.99$. DOCs A8 and A11 incorrectly imply that 0.99 = 1.0.

Comment: Clarify DOCs A8 and A11.

Licensee Response:

1.0-4 DOC L2
ITS definition of Mode 6

DOC L2 states that ITS Mode 6 will range up to 212°F, but the ITS has only 200°F, which is consistent with the STS. **Comment:** Correct the error in the submittal.

Licensee Response:

1.0-5 DOCs LA1, LA2, LA3, and LB1

The referenced LA-type DOCs are deficient in that they do not state (a) which licensee-controlled documents the removed requirements/information/details will be placed and maintained in, and (b) the governing regulatory control processes for changes to these requirements in their new locations. In addition, the LA-type DOCs refer to the requirements as "deleted" when they are more appropriately described as being moved from the TSs to licensee-controlled documents. Lastly, DOC LB1 should be treated as an L-type DOC; however, as this is likely a common deficiency in the entire submittal, it will suffice to state that duplicate reporting requirements of 10 CFR 50.73 are being removed from the TSs and placed in the Technical Requirements Manual. **Comment:** Modify the DOCs as suggested. Also, fix all the other LA-type and LB-type DOCs in the submittal. Alternately, only treat LB-type DOCs as a general category of L-type DOCs and include them with the L-type DOCs in the safety evaluation L-DOC table. Then, the "deletion-from-TS" language can remain.

Licensee Response:

1.0-6 JFD 6
ITS definition of Channel Operational Test (COT)

The ITS definition of COT omits the STS phrase “as close to the sensor as practicable.” The JFD seems to indicate that the phrase is unnecessary, but implies it is part of current testing practice, even though these words are not contained in the corresponding CTS definition of Channel Functional Test. Thus, including it would not pose an undue burden. The reason provided in the JFD (“the additional information in the COT is not necessary”) would apply to any plant’s safety-related instrumentation systems, were it true; and thus, this deviation, were it justifiable, would be generic. The phrase, however, is necessary to ensure adequate testing. **Comment:** Adopt the entire STS COT definition.

Licensee Response:

1.0-7 ITS PTLR definition
JFD 4

The ITS proposes to include certain information (power-operated relief valve (PORV) lift settings and the enable temperature associated with the low-temperature overpressure protection (LTOP) system) in the pressure-temperature limits report (PTLR) instead of in the relevant ITS requirements. Thus, the ITS PTLR definition deviates from the STS PTLR definition by referencing this information and by replacing the explicit list of associated specifications in the PTLR definition with the general phrase “in individual Specifications.” The reasons for these deviations are not plant-specific, but should be resolved in the context of the PTLR review. **Comment:** Adopt the STS definition wording and include PORV lift settings and the enable temperature associated with the LTOP system in the appropriate specifications in the ITS to be consistent with the corresponding STS specifications.

Licensee Response:

1.0-8 ITS definition of L_a
JFD 9

ITS retains the use of “peak design containment pressure (P_a)” instead of the STS’ use of the “calculated peak containment pressure (P_a)” without explaining the difference in JFD 9. **Comment:** Justify the difference, or adopt the STS language.

Licensee Response:

1.0-9 ITS 1.3, Example 1.3-3
JFD 7

The proposed changes to the STS language in the referenced example do not make the example easier to understand, and thus are not justified. It is preferable to stay with the generic STS wording. The additional explanations desired by the licensee are always possible outside the ITS and in operator training. **Comment**: Adopt the STS language for Example 1.3-3.

Licensee Response: