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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

October 17, 1997

Mr. Richard R. Grigg
Chief Nuclear Officer
Wisconsin Electric Power Company
231 West Michigan Street, Room P379
Milwaukee, WI 53201

SUBJECT: POINT BEACH NUCLEAR PLANT, UNIT NOS. 1 AND 2 - QUALITY OF
SUBMITTALS FOR TECHNICAL SPECIFICATION AMENDMENT NOS. 173/174
FOR UNIT NO. 1 AND 177/178 FOR UNIT NO. 2

Dear Mr. Grigg:

As noted in transmittal letters dated July 1, 1997, and July 9, 1997, for Amendment Nos. 173 and 174 for Point Beach Nuclear Plant (PBNP) Unit No. 1 and Amendment Nos. 177 and 178 for PBNP Unit No. 2, respectively, this letter discusses the quality of the technical specifications (TS) change requests (TSCRs) submitted in support of the subject amendments. Chronological synopses for Amendments 173/177 and 174/178 are included as Enclosures 1 and 2.

Enclosure 3, "Content for License Amendment Requests and Safety Evaluation Content," contains guidance on the preparation of TSCRs and safety evaluations. The guidance documents were originally issued on November 22, 1991, as a result of a licensee counterpart meeting in which Wisconsin Electric Power Company (WEPCO) personnel participated. Some specific items were expanded and are shown in bold type. As discussed in Enclosure 3, the TSCR should include the details of the proposed changes, descriptions of how system(s) affected by the TS change operate, a description of which analyses were reviewed to determine if results could be affected by the proposed changes, and the details of changes in plant operation and in analyses of the affected systems based on implementation of the proposed changes.

The initial submittals lacked sufficient information to support an independent assessment of the changes. WEPCO submittals were sufficient in the description of changes; however, three areas need improvement. First, an adequate description of how the affected systems operate and are analyzed (based on current plant operation and design) in light of the proposed changes must be provided. This is necessary since the PBNP Final Safety Analysis Report (FSAR) currently has less detail than other FSARs that are based on Regulatory Guide 1.70 and the Standard Review Plan. Since the PBNP design relies on shared systems between units, it is necessary to ensure sufficient information is provided to the staff as baseline information to allow review of the proposed changes. Secondly, sufficient documentation should be provided to justify that current programs and analyses that are determined not to be affected by the change are indeed adequate. For example, questions on the equipment qualification (EQ) program and post-accident sampling system (PASS) design and operation resulted from statements made in the submittals that stated EQ and PASS were not affected by the changes. When additional information to support your statements was requested, it took some time to obtain the information and to resolve subsequent questions. A third area for improvement is providing an assessment of the

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proposed changes as compared to NUREG-1431, Revision 1, "Westinghouse Owner's Group Improved Standard Technical Specifications (STS)," and whether the changes affect other systems and/or programs included in the STS.

Amendment Nos. 173 and 177 to Facility Operating License Nos. DPR-24 and DPR-27 for the Point Beach Nuclear Plant, Unit Nos. 1 and 2, respectively, were issued July 1, 1997. The amendments included changes to the TS in response to your applications dated June 4, 1996 (TSCR-188, -189)(two applications), as supplemented August 5, September 26, October 21, November 13, November 20, and December 2, 1996, and January 16, March 20, and April 2, 1997. The primary changes to the TS were new setpoints and analyses for the Unit 2 steam generators and changes to the Unit 1 TS resulting from the reanalyses to ensure consistency of the design basis for both units. Your June 4, 1996, applications requested the amendments by September 1, 1996, and yet provided insufficient detail to support a technical review of the proposed changes. Additional information was submitted on August 5, 1996, but a change was requested for one parameter previously submitted and the uncertainty analysis for lo-lo steam generator level was to be submitted later. You requested issuance of the amendments by October 31, 1996. The uncertainty analysis was submitted on September 26, 1996, along with additional changes in TS and revised supporting information. Approval of the amendments was requested by October 31, 1996. As a result of an October 8, 1996, conference call, additional information was submitted on October 21, 1996. On November 13, 1996, additional information was submitted on the proposed change to the average reactor coolant system temperature range that documented the need to submit a letter per the requirements of 10 CFR 50.46 to revise the emergency core cooling system model to include the new peak clad temperature penalties. A request for additional information for dose analysis information for accidents typically reviewed for steam generator replacements was issued on November 13, 1996. A response was submitted on November 20, 1996. Based on discussions with NRC staff, a January 16, 1997, submittal revised additional TS pages to resolve an inconsistency between the radiological analyses and TS. A March 20, 1997, submittal revised the implementation time for Unit 1. The final submittal of April 2, 1997, provided revised information for the steam generator tube rupture and rod ejection accident analyses and submitted information on control room habitability. A meeting was held on April 28, 1997, wherein further concerns were identified with the radiological analyses; however, since the doses for the large-break, loss-of-coolant accident (LOCA) were more severe, WEPCO requested and the staff agreed that further submittals on other accident analyses be deferred. The amendments were issued July 1, 1997.

Amendment Nos. 174 and 178 to Facility Operating License Nos. DPR-24 and DPR-27 for the Point Beach Nuclear Plant, Unit Nos. 1 and 2, respectively, were issued July 9, 1997. The amendments reflect revised system requirements to ensure post-accident containment cooling capability and were issued in response to WEPCO's application dated September 30, 1996 (TSCR-192), as supplemented on November 26 and December 12, 1996, and February 13, March 5, April 2, April 16, May 9, June 3, June 13 (two letters, NPL 97-0350 and 97-0351), and June 25, 1997. Specifically, the original submittal increased the number of service water pumps required to be operable from five to six based on changes in service water system operation (i.e., throttling service water discharge valves for the containment fan coolers.)

Review of the containment heat removal systems identified that operation of the containment spray system only during the injection phase required changes to the spray removal coefficient utilized in the dose analyses. The amounts of water available, both from the refueling water storage tank and from the sump, were revised several times. These changes required a review of the radiological consequences for a large-break LOCA. Initial submittals did not address the radiological consequences to the control room operators since this information had not been included in the FSAR. During your review of the original control room habitability analysis, you found an error in the distance between the release points and the control room intake. Additionally, assumptions used on the operation of the control room ventilating system had been invalidated by a modification installed in 1994. During the review of the amendments, you determined that the minimum number of operable component cooling water pumps, based on the revised containment integrity analysis, needed to be increased from three to four.

In summary, the TSCRs were not submitted in sufficient time to permit issuance of the amendments when you requested. The quality of the safety evaluations and the lack of sufficient supporting information that would allow the staff to make an informed independent determination of the effects of the proposed changes severely hampered staff review. If you have any questions, please contact Linda L. Gundrum at 301 415-1380.

Sincerely,

ORIGINAL SIGNED BY

John N. Hannon, Director
 Project Directorate III-1
 Division of Reactor Projects - III/IV
 Office of Nuclear Reactor Regulation

Docket Nos. 50-266
 and 50-301

- Enclosures: 1. Chronology of TSCR-188 AND -189 Submittals
 2. Chronology of TSCR-192 Submittals
 3. Content of license amendment requests
 and safety evaluations

cc w/encls: See next page

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Mr. Richard R. Grigg
Wisconsin Electric Power Company

Point Beach Nuclear Plant
Unit Nos. 1 and 2

cc:

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**CHRONOLOGY OF TECHNICAL SPECIFICATIONS CHANGE
REQUESTS (TSCR) -188 AND -189 SUBMITTALS**

June 4, 1996, to Document Control Desk (DCD), from Bob Link

Submitted proposed TSCR-188 revisions to TS 15.2.3, "Limiting Safety System Settings and Protective Instrumentation, and Section 15.5, "Design Features," to reflect new steam generators (SGs).

June 4, 1996, to DCD, from Bob Link

Submitted proposed TSCR-189 revisions to TS 15.2.1, "Safety Limit, Reactor Core," 15.2.3, "Limiting Safety System Settings, Protective Instrumentation," and 15.3.1.G, "Operational Limitations."

August 5, 1996, to DCD, from Bob Link

Submitted revisions to K1 term of OTΔT, new lo-lo steam generator water level setting limits for reactor trip and auxiliary feedwater initiation necessary because of the difference in lower level tap location between the existing and replacement steam generators. Included instrument uncertainty analyses, except for steam generator lo-lo level. Included revised FSAR sections affected by the changes. Since the start of the outage was planned for October 5, 1996, WEPCO requested the changes by October 31, 1996.

September 26, 1996, to DCD, from Bob Link

Submitted uncertainty analysis for SG low-low level, corrected error in steam generator tube rupture (SGTR) dose analysis, and deleted water volume in TS bases. Requested approval by October 31, 1996.

October 21, 1996, to DCD, from Bob Link

Responded to questions asked by staff on previously submitted information on loss of load, main steam line break (MSLB), SGTR, small-break, loss-of-coolant accident (SBLOCA), and rod ejection accident analyses.

November 13, 1996, to DCD, from Bob Link

Provided additional information on SBLOCA.

November 20, 1996, to DCD, from Bob Link

Provided additional information on SGTR, MSLB, locked rotor, and rod ejection accident analyses.

January 16, 1997, to DCD, from G. Krieser

Changed reference document for dose conversion factors, corrected nominal pressure setting for high-pressure trip, and removed unused references.

March 20, 1997, to DCD, from D. Johnson

Clarified relief valve setpoints and deleted footnote for reactor coolant system (RCS) average temperature range for Unit 1.

April 2, 1997, to DCD, from D. Johnson

Submitted additional information for the SGTR and rod ejection accident analyses, control room ventilating system design, and corrected and revised information previously submitted on January 16, 1997.

CHRONOLOGY OF TSCR-192 SUBMITTALS

September 30, 1996, to DCD, from Bob Link

Requested modification to TS. 15.3.3, "Emergency Core Cooling System, Auxiliary Cooling Systems, Air Recirculation Fan Coolers, and Containment Spray," to modify operability requirements for the service water system (SWS). Also modify TS 15.3.7, "Auxiliary Electrical Systems," to reflect the modified service water operability requirements.

November 26, 1996, to DCD, from Bob Link

Provided response to November 13, 1996, request for additional information (RAI) and added a request to change TS 15.5.2, "Containment," by modifying the heat removal capacity of the reactor containment air cooler units. Clarified assumptions associated with new (1996) post-LOCA containment pressure and temperature analysis including new 33 degree F cooling by the residual heat removal (RHR) heat exchanger and component cooling water (CCW) system. Supplement promised by December 13, 1996, to reflect two CCW pumps per unit.

December 12, 1996, to DCD, from G. Krieser

Submitted changes to TS 15.3.3.C to require four operable CCW pumps for two-unit operation, changed allowed outage time from 24 hours to 72 hours. Modify TS. 15.3.3.D.2.d to require five operable service water pumps when containment fan cooler (CFC) motor-operated valves are open.

February 13, 1997, to DCD, from D. Johnson

Provided supplemental information on radiological consequences of a LOCA and provided additional information on assumed delay time for containment spray and CFC initiation.

March 5, 1997, to DCD, from D. Johnson

Provided long-term commitment to achieve compliance with General Design Criterion 19 dose limits without the use of potassium iodide or supplied air breathing apparatus.

April 2, 1997, to DCD, from D. Johnson

Provided information on containment spray duration, containment spray iodine removal constants, and bases for assumed control room occupancy factor and ECCS leakage.

April 16, 1997, to DCD, from D. Johnson

Provided supplemental information on impact of TSCR-192 on equipment qualification program.

May 9, 1997, to DCD, from D. Johnson

Submitted changes to CCW system and SWS TSs to address operation's comments.

June 3, 1997, to DCD, from D. Johnson

Provided revised radiological analyses for LOCA, supplemental and revised information for the containment integrity analysis, and environmental qualification evaluation.

June 13, 1997, to DCD, from D. Johnson

Provided response to June 9, 1997, RAI on control room ventilating system design, operation, and testing.

June 13, 1997, to DCD, from D. Johnson

Submitted additional assurances on what actions will be taken during interim used of KI, such as control room ventilating system periodic inspections, filtration testing, ECCS equipment leakage testing, and walkdowns of the ECCS piping outside of containment.

June 25, 1997, to DCD, from D. Johnson

Submitted commitment to operate within SWS analyses and approved procedures.

CONTENT OF LICENSE AMENDMENT REQUESTS AND SAFETY EVALUATIONS

Each amendment request should include the following information:

A description of the content of the current license condition or TS including specific identification of the license condition or TS (e.g., paragraph 2.C(8), "Emergency Preparedness," or TS 3/4.2.4, "DNBR Margin")

A description of the proposed change

A discussion of the purpose or function of the subject area for which a change is being requested (e.g., if a TS is involved, the purpose of the specification)

A discussion of why the change is being requested

A safety evaluation demonstrating the adequacy of the level of safety provided in support of the requested change

A discussion of whether a no significant hazards consideration is involved and the basis for the determination, using the standards in 10 CFR 50.92(c)

An environmental impact consideration determination (see 10 CFR 51.21 and 10 CFR 51.22)

Marked-up pages reflecting the requested changes

Final typed revised TS pages (preferably with an electronic version of the affected pages)

The submittal should include separate enclosures for no significant hazards consideration and the safety evaluation

Signed affidavit

The safety evaluations provided for staff review and approval should include the following information:

A description of the areas being evaluated

A discussion of the analytical methods used, including the input parameters and the basis for these parameters, in support of the proposed changes. The discussion should state whether the methods are different than those previously used and whether the methods have been previously reviewed and approved by the staff. **If the methodology was previously used, provide reference to the staff's approval of the methodology. The licensee should ensure that previously approved methodologies are still valid and conservative in light of currently accepted methodologies. The licensee is responsible for ensuring the accuracy of all input parameters which may include calculations, testing results, manufacturer's information, etc. The licensee should be prepared to submit such documentation.**

An evaluation should also be provided for administrative changes to determine whether the changes have an adverse safety impact.

The results of the evaluation which demonstrates the adequacy of the level of safety provided by the proposed change.

The level of detail provided by the safety evaluation should be such that the staff can make an independent assessment of the evaluation based on the information provided by the licensee. **If proposed changes can affect other analyses or current licensing bases, such as the extent of a harsh environment, change loading on emergency diesel generators, etc, the documentation (calculations, testing, etc.) should be submitted if it is needed to independently assess declarative statements that the analyses and/or current licensing bases are not impacted by the proposed changes.**

Be prepared to submit more detail than in the past and to go into deeper explanations and discussions with the project manager.

An independent critical reviewer should be able to go through the safety evaluation without referring to documents that the project manager does not have. Any required references may be requested by the project manager.