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Kewaunee / Point Beach Nuclear
Operated by Nuclear Management Company, LLC

NRC 2002-0060

10 CFR 50.90

July 12, 2002

U.S. Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555

Dockets 50-266 and 50-301
Point Beach Nuclear Plant, Units 1 and 2
Clarification of Information
License Amendment Request 227
Technical Specification LCO 3.8.1, AC Sources - Operating

By submittal dated May 29, 2002, Nuclear Management Company, LLC (NMC) requested an amendment to the Technical Specifications (TS) for Point Beach Nuclear Plant, Units 1 and 2. The proposed amendment would revise TS 3.8.1, AC Sources – Operating, to allow portions of surveillance requirement (SR) 3.8.1.5 to be performed with the unit in Mode 1, 2, 3 or 4. This proposed amendment is consistent with changes made to NUREG-1431, Standard Technical Specifications, Westinghouse Plants, by TSTF-283, Revision 3.

During a conference call between NMC representatives and NRC staff on July 8, 2002, NRC staff requested clarifying information regarding certain aspects of the submittal. Attachment 1 of this letter provides the NMC response to the staff's questions. The information provided does not require any changes to the proposed Technical Specifications nor their Bases.

We have determined that this clarification of 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.

NMC requests approval of the proposed License Amendment by August 31, 2002, with the amendment being implemented within 60 days. The approval date was administratively selected to allow for NRC review but the plant does not require this amendment to allow continued safe full power operation.

In accordance with 10 CFR 50.91, a copy of this application, with attachments, is being provided to the designated Wisconsin Official.

A001

To the best of my knowledge and belief, the statements contained in this document are true and correct. In some respects, these statements are not based entirely on my personal knowledge, but on information furnished by cognizant NMC employees and consultants. Such information has been reviewed in accordance with company practice and I believe it to be reliable.

I declare under penalty of perjury that the foregoing is true and correct.
Executed on July 12, 2002.



Mark E. Warner
Site Vice President

JG/kmd

Attachment: 1 - Clarification of Information

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

CLARIFICATION OF INFORMATION
LICENSE AMENDMENT REQUEST 227
TECHNICAL SPECIFICATION LCO 3.8.1, AC SOURCES - OPERATING
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

The following information is provided in response to the Nuclear Regulatory Commission staff's request for clarifying information on NMC's May 29, 2002 License Amendment Request (LAR), as discussed during telephone conferences between NRC and NMC staff on July 8, 2002. The LAR would modify Technical Specification (TS) 3.8.1, AC Sources – Operating, to allow portions of surveillance requirement (SR) 3.8.1.5 to be performed in MODE 1, 2, 3, or 4.

The NRC requested clarification regarding what portions of SR 3.8.1.5 would be performed in MODE 1, 2, 3, or 4; examples of the types of circumstances that would necessitate performing this SR in MODE 1, 2, 3, or 4; and further explanation of the process that would be employed to perform this SR in MODE 1, 2, 3, or 4.

As stated in NMC's May 29, 2002 LAR, the onsite standby emergency power system is comprised of four emergency diesel generators (EDGs) that directly supply the 4.16 kV safeguards electrical distribution buses. Normally, all four EDGs are operable and aligned to their normal bus; however, the EDGs can be aligned such that only one EDG per safeguards train is required operable to support one or both units. In addition, either EDG may be manually connected to one or both of its respective trains' 4.16 kV safeguards distribution buses. The TS only require two of the four EDGs onsite to be operable for full power operation of both units.

Because of this unique EDG configuration and capability, SR 3.8.1.5 must be completed on each EDG separately for each reactor unit (i.e., SR 3.8.1.5 must be performed on all four EDGs while they are aligned to Unit 1 and then must be completely reperformed on all four EDGs while they are aligned to Unit 2. This has normally been done during each respective reactor unit's refueling outage. Consequently, SR 3.8.1.5 is performed on each EDG twice during the required 18-month interval (rather than once, as would be required in a standard design plant).

During the spring 2002 refueling outage of Unit 2, SR 3.8.1.5 was satisfactorily performed on EDGs G-01, G-03 and G-04 for Unit 2. EDG G-02 was not available for testing at that time; therefore, SR 3.8.1.5 was only partially completed on this diesel for Unit 2. Specifically, SR 3.8.1.5 sections 'a' and 'b' (de-energization of buses and load shedding from buses) were satisfactorily completed since this portion did not require the EDG. Those portions of SR 3.8.1.5.c.2 that did not require EDG G-02 were also performed. Please note that SR 3.8.1.5 is met for Unit 1 on G-02 since it was successfully completed during the previous Unit 1 refueling outage.

This particular situation at Point Beach, regarding the necessity to perform SR 3.8.1.5 with Unit 2 at power, arose because EDG G-02 was off-site for testing during the regularly scheduled performance of SR 3.8.1.5 for Unit 2. Unexpected complications resulted in EDG G-02 being offsite and unavailable for performance of its associated portions of the SR during the entire span of the Unit 2 refueling outage. SR 3.8.1.5 is normally only performed during scheduled refueling outages of the associated unit.

NMC is planning to complete SR 3.8.1.5.c on EDG G-02 for Unit 2 with Unit 2 in MODE 1. Currently, SR 3.8.1.5 is modified by a note that this surveillance not be performed with the associated unit in MODE 1, 2, 3 or 4. In discussing this note, the current TS Bases state, "The reason for the Note is that the performance of the Surveillance would remove a required offsite source from service, perturb the electrical distribution system and challenge safety systems". **However, because of the redundancy of EDGs at Point Beach, one EDG may be realigned such that it is not associated with, nor required by, either unit.** Testing may then be performed on this EDG without removing a required offsite source from service or perturbing the electrical distribution system. The ESF loads on this bus were already loaded onto the safeguards bus (while powered by the other EDG) and tested during the spring 2002 Unit 2 refueling outage.

The current TS Bases also state, "The requirement to verify the connection and power supply of permanent and autoconnected loads is intended to satisfactorily show the relationship of these loads to the standby emergency power source loading logic. In certain circumstances, many of these loads cannot actually be connected or loaded without undue hardship or potential for undesired operation. For instance, Emergency Core Cooling Systems (ECCS) injection valves are not desired to be stroked open, or high pressure injection systems are not capable of being operated at full flow, or residual heat removal (RHR) systems performing a decay heat removal function are not desired to be realigned to the ECCS mode of operation. In lieu of actual demonstration of connection and loading of loads, testing that adequately shows the capability of the standby emergency power source systems to perform these functions is acceptable. This testing may include any series of sequential, overlapping, or total steps so that the entire connection and loading sequence is verified."

The above TS Bases statements provide the reason for performing SR 3.8.1.5. They also provide an allowance for simulating portions of the test which may cause "undue hardship or potential for undesired operation." Therefore, "...in lieu of actual demonstration of connection and loading of loads", such as the requirement to demonstrate the emergency standby power source "...energizes permanently connected loads and energizes auto-connected emergency loads through load logic sequencer", the SR can be performed through "...testing that adequately shows the capability of the standby emergency power source systems to perform these functions."

The proposed Bases for TS 3.8.1 state, "This restriction from normally performing the Surveillance in MODE 1, 2, 3 or 4 is further amplified to allow portions of the Surveillance to be performed for the purpose of reestablishing OPERABILITY (e.g., post work testing following corrective maintenance, corrective modification, deficient **or incomplete surveillance testing**, and other unanticipated OPERABILITY concerns) provided an assessment determines plant safety is maintained or enhanced" (emphasis added). The proposed modification to the note will enhance the ability of Point Beach to take advantage of its redundant EDGs for completing SR 3.8.1.5 without the risk of an unnecessary plant shutdown. Equivalent reactor safety is maintained by the proposed addition to the TS of a precondition for performing this SR in MODE 1,2,3 or 4. This condition stipulates that this SR may only be performed in these Modes if an assessment determines that the safety of the plant is maintained or enhanced.

Proposed Testing Outline

Part of the surveillance testing may be performed using an inductive and resistive programmable load bank that can simulate both motor starting and running loads. The load bank is nominally rated at 5000 kW resistive and 4500 kVAR inductive. Alternately, this part of the surveillance may be performed by sequencing and loading Unit 1 loads onto the diesel while Unit 1 is shutdown for refueling. The Unit 1 emergency load profile bounds the Unit 2 load profile (for loads powered by G-02).

The portions of SR 3.8.1.5 associated with Unit 2 for EDG G-02 that have already been completed during the spring 2002 Unit 2 refueling outage are not proposed to be repeated with Unit 2 at power.

SR 3.8.1.5.c.3 and 3.8.1.5.c.4, and the incomplete portion of SR 3.8.1.5.c.2, are planned to be checked either via a programmable load bank capable of simulating the KW AND KVAR load profile associated with the emergency load sequencing, or by actually sequencing and loading Unit 1 loads onto the diesel (while Unit 1 is in MODE 5 or 6). The Unit 2 portion of these particular tests is planned to be performed with Unit 2 at power.

SR 3.8.1.5.c.1 and 3.8.1.5.c.5 are planned to be checked using a special test procedure that would start and operate "A" Train Safety Related Loads. These loads can be operated safely with the units at power and their operation in this condition is permitted by technical specifications. The EDG would then be paralleled to the bus and, after nulling current through the normal feeder breaker; the normal feeder breaker would be opened. The "A" Train loads would then be operated on the EDG for greater than 5 minutes. Operators would then parallel across and re-close the normal feeder breaker, transfer the loads from the EDG to the offsite power supply and secure the EDG. This portion of the surveillance testing would use actual plant loads (rather than a load bank).

Because of the unique EDG configuration and capability at Point Beach, the addition of the proposed Note to the SR only enhances the ability of Point Beach to take advantage of its redundant EDGs for completing SR 3.8.1.5 safely. Any potential for perturbation of the electrical distribution system or challenges to safety systems are only minimally affected by the addition of this Note.

Routine use of this Note to defer the SR is neither planned nor envisioned. In the future, the Note would allow completion of portions of the SR outside of refueling outages should unexpected conditions preclude performing those portions of the SR during the refueling outage. Only those portions of the SR that could be evaluated as being able to be safely performed under the plant operating conditions would be performed. This would eliminate the need for unnecessary shutdowns of a unit. The Note would also facilitate coordinating portions of the SR between Unit 1 and Unit 2 refueling outages such that unnecessary duplication of SR steps is eliminated and thereby wear on the EDGs is reduced.