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Wisconsin Electric POWER COMPANY
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March 24, 1983

Plant 12.3.3 CR#76

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. R. A. Clark, Chief
Operating Reactors Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
AUXILIARY FEEDWATER SYSTEM OPERABILITY
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Recently we have had several discussions with NRC personnel concerning the concept of operability as it relates to the Point Beach auxiliary feedwater system (AFWS). Section 15.3.4 of the Point Beach Technical Specifications presents the limiting conditions for operation for the AFWS. Among other items, these specifications require all four auxiliary feedwater pumps (two motor-driven pumps shared by the units and two steam turbine-driven pumps dedicated to their respective units) together with their associated flow paths and essential instrumentation to be operable for two-unit operation at power. For operation of a single unit at power both motor-driven pumps and the associated steam-driven pump must be operable.

The discharge flow of each motor-driven auxiliary feedwater pump is controlled by air-operated control valves and passes through motor-operated isolation valves to each steam generator. Presently, during normal operations the motor-operated isolation valves in all AFWS trains are open. Under certain circumstances, for example after a unit trip or initiation of auxiliary feedwater flow due to a plant transient, the auxiliary feedwater pumps are used to control steam generator water level in the affected unit. Under these conditions, in order to provide feedwater to the shut down or affected unit, which may have its steam generator pressure higher than that of the operating or unaffected unit, the plant Emergency Operating Procedures require

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the motor-operated isolation valves in the motor-driven auxiliary feedwater trains to the operating unit to be shut. This temporarily isolates the motor-driven auxiliary feedwater pumps from the operating unit. Similar circumstances can develop during shutdown or startup of a unit or surveillance testing of the motor-driven auxiliary feedwater pumps.

It has been Wisconsin Electric's understanding that the motor-driven auxiliary feedwater pumps are "operable" with respect to the isolated or unaffected unit under these circumstances since the motor-operated discharge valves can be reopened, if necessary, from the control room by operator action. We also understand that it is the NRC's concern under an alternate interpretation of the Technical Specifications that whenever an operating unit's motor-operated discharge valves are shut, the specified number of auxiliary feedwater pumps required for single unit operation is not being satisfied. Under the NRC's interpretation the isolated unit must be placed in a hot shutdown condition within three hours. This alternate interpretation assumes that operability requires complete automatic initiation of auxiliary feedwater flow without operator action.

Although we continue to believe that our interpretation of the AFWS Technical Specification is safe and responsible, we recognize the NRC concerns and are presently studying procedural and hardware modifications to the AFWS which could resolve the differences in these interpretations. We anticipate completing these studies within 90 days and will notify you by June 20, 1983 of any modifications, or changes to procedures, with respect to the AFWS which would resolve the NRC staff's concerns. The existing criteria established in the Emergency Operating Procedures regarding the use and requirements for effective auxiliary feedwater flow under the scope of these procedures will not be changed.

During the interim period we have also decided to take the following additional actions. The plant licensed operators will be instructed to minimize, to the extent practicable, the duration of AFWS isolation valve closure to the unaffected unit during recovery from transient conditions. Furthermore, during periods when the AFWS is required to provide feedwater flow to a unit which is shut down or undergoing startup or surveillance testing, the operators will be instructed to minimize use of the motor-driven auxiliary feedwater pumps, to utilize a single motor-driven pump when practical, and to restore the alignment of the AFWS to the standby/ready mode (i.e., pump secured with all discharge isolation valves open) whenever possible.

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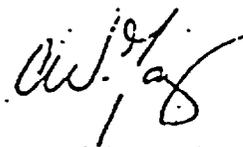
Since the NRC's interpretation of the Technical Specification for AFWS operability would result in literal violation of the limiting conditions for operation, or operation in a degraded mode permitted by the specifications, whenever an AFWS discharge isolation valve to an operating unit is shut, you may consider that a temporary change to the Technical Specifications would be appropriate. Under these conditions, we would propose that the following exemption or temporary clarification could be issued to the Point Beach Nuclear Plant Technical Specification. A new sentence could be added to Specification 15.3.4.A.2 to read:

"C. When necessary to provide feedwater to a unit for purposes of unit startup, shutdown, surveillance testing, or transient recovery, the motor-driven auxiliary feedwater pump discharge valves to the other unit may be temporarily shut."

Initiation of auxiliary feedwater to the unit isolated from the motor-driven auxiliary feedwater pumps would still be available without operator action from the turbine-driven auxiliary feedwater pumps.

If you consider that a change to the Technical Specification is appropriate, please notify us and treat this letter as our application for such change. We will, of course, provide the necessary license amendment approval fee upon your notification. Please contact us if you have any questions concerning our plans for resolution of this matter.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Copies to NRC Resident Inspector.
J. G. Keppler, Region III

Blind copies to Messrs. R. W. Britt
Sol Burstein
R. H. Gorske/A. W. Finke
D. K. Porter
J. J. Zach
Gerald Charnoff