

NRC 2003-0058

10 CFR 50.12
10 CFR 50.90

June 27, 2003

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

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
DOCKETS 50-266 AND 50-301
LICENSE AMENDMENT REQUEST 235
TECHNICAL SPECIFICATION LCO 5.6.5, REACTOR COOLANT SYSTEM (RCS)
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

References: 1. Letter from NMC to NRC dated March 3, 2003.
2. Letter from NRC to NMC dated July 23, 2001.

In Reference 1, Nuclear Management Company, LLC (NMC) submitted requests for exemptions to 10 CFR 50.61, Appendices G and H to 10 CFR 50, and approval of Pressurized Thermal Shock (PTS) application for Point Beach Nuclear Plant (PBNP) Unit 2 and proposed heatup and cooldown limit curves for PBNP Units 1 and 2, in accordance with the provisions of 10 CFR 50.12.

In association with the request for exemptions, PBNP identified that prior to crediting use of the new P/T curves and the associated methodology, a revised reference in PBNP Technical Specifications (TS) 5.6.5, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)", would be needed.

In accordance with 10 CFR 50.90, NMC is therefore submitting this request for an amendment to the TS for PBNP, Units 1 and 2. The proposed amendment would modify TS 5.6.5, to replace the reference to the NRC letter accepting the current PTLR methodology (Reference 2) with a reference to the issuance date of the NRC safety evaluation accepting the new methodology.

This amendment request is consistent with changes made to NUREG-1431, Standard Technical Specifications, Westinghouse Plants, Technical Specification Task Force TSTF- 419, Revision 0, "Revise PTLR Definition and References in ISTS 5.6.6, RCS PTLR".

Attachment I to this letter provides a description, justification, and a significant hazards determination for the proposed change. Attachment II provides the existing Technical Specifications pages marked up to show the proposed change. Attachment III provides revised (clean) Technical Specifications pages.

NMC requests approval of the proposed license amendment by October 2003, concurrent with the approval of the exemption request submitted March 3, 2003, with the amendment being implemented within 60 days.

This letter contains no new commitments and no revision to existing commitments.

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

I declare under penalty of perjury that the foregoing is true and accurate. Executed on June 27, 2003.



A. J. Cayia
Site Vice-President

LAS/kmd

Attachments:

- I. Description and Assessment
- II. Proposed Technical Specification Change
- III. Revised Technical Specification Pages

cc: Regional Administrator, Region III, USNRC
Project Manager, Point Beach Nuclear Plant, NRR, USNRC
NRC Resident Inspector - Point Beach Nuclear Plant
PSCW

DESCRIPTION AND ASSESSMENT OF CHANGE

LICENSE AMENDMENT REQUEST 235

**TECHNICAL SPECIFICATION LCO 5.6.5, "REACTOR COOLANT SYSTEM (RCS)
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)"**

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

1.0 DESCRIPTION

This proposed License Amendment Request (LAR) is made pursuant to 10 CFR 50.90 to modify Technical Specifications (TS) 5.6.5, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)".

2.0 BACKGROUND

NMC is requesting that the PBNP TS be modified consistent with the changes described in the staff approved Industry/TSTF Standard TS Change, TSTF-419 Revision 0 (TSTF-419), "Revise PTLR Definition and References in ITS 5.6.6, RCS PTLR". TSTF-419 was approved by the NRC on March 21, 2002.

NRC Generic Letter 96-03, "Relocation of the Pressure Temperature Limit Curves and Low Temperature Overpressure Protection System Limits", dated January 31, 1996, allows licensees to relocate the pressure temperature (P/T) limit curves from their plant TS to a PTLR or a similar document. The methodology used to determine the P/T and LTOP system limit parameters must comply with the specific requirements of Appendices G and H to Part 50 of Title 10 of the Code of Federal Regulations (10 CFR), be documented in an NRC approved topical report or an NRC approved plant-specific submittal, and be incorporated by reference into the TS. Subsequent changes in the methodology must be approved by a license amendment.

3.0 DESCRIPTION OF CHANGE

Summary of Proposed Technical Specifications Change:

NMC proposes to modify TS 5.6.5, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)", to delete the reference to the NRC letter accepting the current methodology used to determine the RCS pressure and temperature limits, and replace it with a reference to the NRC safety evaluation accepting the new methodology.

4.0 ASSESSMENT

This amendment request is consistent with TSTF-419, meeting the requirements in TS 5.6.5, to identify either the Topical Report(s) by number and title or the NRC Safety Evaluation for a plant specific methodology by NRC letter and date. The NRC letter currently referenced in TS 5.6.5 is the NRC safety evaluation dated July 23, 2001. This proposed amendment would replace the reference to the July 23, 2001 letter with a reference to the NRC letter that will be issued accepting the revised methodology.

The details of the proposed change and the justification for the finding of no significant hazards are provided in this attachment. Attachments II and III provide the revisions to the affected TS pages.

5.0 REGULATORY ANALYSIS

5.1 No Significant Hazards Determination

In accordance with the requirements of 10 CFR 50.90, Nuclear Management Company, LLC (NMC) (licensee) hereby requests amendments to facility operating licenses DPR-24 and DPR-27, for Point Beach Nuclear Plant (PBNP), Units 1 and 2, respectively. The purpose of the proposed amendments is to revise TS 5.6.5, "Reactor Coolant System (RCS) Pressure and Temperature Limits Report (PTLR)", to delete the reference to the NRC letter accepting the current methodology used to determine the RCS pressure and temperature limits, and replace it with a reference to the NRC safety evaluation accepting the new methodology.

NMC has evaluated the proposed amendment in accordance with 10 CFR 50.91 against the standards in 10 CFR 50.92 and has determined that the operation of PBNP in accordance with the proposed amendments presents no significant hazards. Our evaluation against each of the criteria in 10 CFR 50.92 follows.

1. Operation of PBNP in accordance with the proposed amendments does not result in a significant increase in the probability or consequences of any accident previously evaluated.

The proposed change references the NRC safety evaluation accepting the new methodology used to determine the P/T limits or LTOP setpoints that have been reviewed and approved by the NRC. Implementation of revisions to Topical Reports would still be reviewed in accordance with 10 CFR 50.59 and, where required, receive NRC review and approval. The proposed change does not adversely affect accident initiators or precursors nor alter the design assumptions, conditions, or configuration of the facility or the manner in which the plant is operated and maintained. The proposed change does not alter or prevent the ability of structures, systems, and components (SSCs) from performing their intended function to mitigate the consequences of an initiating event within the assumed acceptance limits. The proposed change does not affect the source term, containment isolation, or radiological release assumptions used in evaluating the radiological consequences of an accident previously evaluated. Further, the proposed change does not increase the types or amounts of radioactive effluent that may be released offsite, nor significantly increase individual or cumulative occupational/public radiation exposures. The proposed change is consistent with safety analysis assumptions and resultant consequences. Therefore, it is concluded that this change does not increase the probability of occurrence of an accident previously evaluated.

- 2. Operation of PBNP in accordance with the proposed amendments does not result in a new or different kind of accident from any accident previously evaluated.**

The proposed change references the NRC safety evaluation accepting the new methodology used to determine the P/T limits or LTOP setpoints that have been reviewed and approved by the NRC. Implementation of revisions to Topical Reports would still be reviewed in accordance with 10 CFR 50.59 and, where required, receive NRC review and approval. The change does not involve a physical alteration of the plant (i.e., no new or different type of equipment will be installed) or a change in the methods governing normal plant operation. In addition, the changes do not impose any new or different requirements or eliminate any existing requirements. The changes do not alter assumptions made in the safety analysis. The proposed changes are consistent with the safety analysis assumptions and current plant operating practice. Therefore, the proposed change does not create the possibility of a new or different kind of accident from any previously evaluated.

- 3. Operation of PBNP in accordance with the proposed amendments does not result in a significant reduction in a margin of safety.**

The proposed change references the NRC safety evaluation accepting the new methodology used to determine the P/T limits or LTOP setpoints that have been reviewed and approved by the NRC. Implementation of revisions to Topical Reports would still be reviewed in accordance with 10 CFR 50.59 and, where required, receive NRC review and approval. The proposed change does not alter the manner in which safety limits, limiting safety system settings or limiting conditions for operation are determined. The setpoints at which protective actions are initiated are not altered by the proposed changes. Sufficient equipment remains available to actuate upon demand for the purpose of mitigating an analyzed event.

Conclusion

Operation of PBNP in accordance with the proposed amendment will not result in a significant increase in the probability or consequences of any accident previously analyzed; will not result in a new or different kind of accident from any accident previously analyzed; and, does not result in a significant reduction in any margin of safety. Therefore, operation of PBNP in accordance with the proposed amendment does not result in a significant hazards determination.

5.2 Applicable Regulatory Requirements

Administrative Controls, per 10 CFR 50.36(c)(5), are "...the provisions relating to organization and management, procedures, recordkeeping, review and audit, and reporting necessary to assure operation of the facility in a safe manner." The technical analysis performed by NMC concludes that the proposed changes to TS 5.6.5 will continue to assure operation of the facility in a safe manner.

NMC concludes that the proposed changes are in accordance with 10 CFR 50.36(c)(5) with regards to use of approved analytical methods and providing the necessary reporting requirements. The proposed changes thus continue to be compliant with the above regulatory requirements.

5.3 Commitments

There are no actions committed to by NMC in this document. Any statements in this submittal are provided for information purposes and are not considered to be commitments.

6.0 ENVIRONMENTAL EVALUATION

NMC has determined that the information for the proposed amendment 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.

Accordingly, this proposed amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with this proposed amendment.

PROPOSED TECHNICAL SPECIFICATION CHANGES

LICENSE AMENDMENT REQUEST 235

**TECHNICAL SPECIFICATION LCO 5.6.5, "REACTOR COOLANT SYSTEM (RCS)
PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)"**

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

MARKUP TS PAGE:

TS 5.6-5

5.6 Reporting Requirements

5.6.5 Reactor Coolant System (RCS) PRESSURE AND TEMPERATURE LIMITS REPORT (PTLR)

- a. RCS pressure and temperature limits for heat up, cooldown, low temperature operation, criticality, hydrostatic testing, LTOP enabling, and PORV lift settings as well as heatup and cooldown rates shall be established and documented in the PTLR for the following:
 - (1) LCO 3.4.3, "RCS Pressure and Temperature (P/T) Limits"
 - (2) LCO 3.4.6, "RCS Loops-MODE 4"
 - (3) LCO 3.4.7, "RCS Loops-MODE 5, Loops Filled"
 - (4) LCO 3.4.10, "Pressurizer Safety Valves"
 - (5) LCO 3.4.12, "Low Temperature Overpressure Protection (LTOP)"
- b. The analytical methods used to determine the RCS pressure and temperature limits shall be those previously reviewed and approved by the NRC, specifically those described in the NRC Letters dated October 6, 2000 and ~~July 23, 2004~~ [_____, 2003].
- c. The PTLR shall be provided to the NRC upon issuance for each reactor vessel fluence period and for any revision or supplement thereto.

5.6.6 PAM Report

When a report is required by Condition B or G of LCO 3.3.3, "Post Accident Monitoring (PAM) Instrumentation," a report shall be submitted within the following 14 days. The report shall outline the preplanned alternate method of monitoring, the cause of the inoperability, and the plans and schedule for restoring the instrumentation channels of the Function to OPERABLE status.

5.6.7 Tendon Surveillance Report

Abnormal conditions observed during testing will be evaluated to determine the effect of such conditions on containment structural integrity. This evaluation should be completed within 30 days of the identification of the condition. Any condition which is determined in this evaluation to have a significant adverse effect on containment structural integrity will be considered an abnormal degradation of the containment structure.

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REVISED TS PAGE:

TS 5.6-5

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