June 29, 2007

NRC 2007-0051
10 CFR 50.90

U S Nuclear Regulatory Commission
ATTN: Document Control Desk
Washington, DC 20555-0001

Point Beach Nuclear Plant Units 1 and 2
Dockets 50-266 and 50-301
Renewed License Nos. DPR-24 and DPR-27

License Amendment Request 255
Application for Technical Specification Change TSTF-491, "Removal of the Main Steam and Main Feedwater Valve Isolation Time From Technical Specifications"
Using Consolidated Line Item Improvement Process

In accordance with the provisions of 10 CFR 50.90, Nuclear Management Company, LLC (NMC) is submitting a request for an amendment to the Technical Specifications (TS) for the Point Beach Nuclear Plant, Units 1 and 2.

The proposed amendment would modify the TS by removing the specific isolation time for the main steam isolation valves from the associated TS Surveillance Requirements (SRs).

Enclosure 1 provides a description of the proposed change, the requested confirmation of applicability, and plant-specific verifications. Enclosure 2 provides the existing TS page marked up to show the proposed changes. Enclosure 3 provides the existing TS Bases pages marked up to show the proposed changes. The Bases pages are being provided for information only.

NMC requests approval of the proposed license amendment by March 14, 2008, with the amendment being implemented within 90 days. In accordance with 10 CFR 50.91, a copy of this application, with enclosures, is being provided to the designated Wisconsin Official.

Summary of Commitments

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

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 29, 2007.

Dennis. L. Koehl
Site Vice President, Point Beach Nuclear Plant
Nuclear Management Company, LLC

Enclosures (3)

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

Description and Assessment

1.0 DESCRIPTION

The proposed amendment would modify Technical Specifications (TS) by removing the specific isolation time for the main steam isolation valves from the associated TS Surveillance Requirements (SRs) to the inservice testing program.

The changes are consistent with Nuclear Regulatory Commission (NRC) approved Industry/Technical Specification Task Force (TSTF) TSTF-491, "Removal of the Main Steam and Main Feedwater Valve Isolation Time from Technical Specifications," Revision 2. The availability of this TS improvement was published in the Federal Register on December 29, 2006, as part of the Consolidated Line Item Improvement Process (CLIIP).

2.0 ASSESSMENT

2.1 Applicability of TSTF-491, and Published Safety Evaluation

Nuclear Management Company, LLC (NMC) has reviewed TSTF-491 (Reference 1), and the NRC model safety evaluation (SE) (Reference 2) as part of the CLIIP. NMC has concluded that the information in TSTF-491, as well as the SE prepared by the NRC staff are applicable to the Point Beach Nuclear Plant (PBNP) Units 1 and 2, and justify this amendment for the incorporation of the changes to the PBNP TS.

2.2 Optional Changes and Variations

NMC is not proposing any variations or deviations from the NRC staff's model safety evaluation dated October 5, 2006, associated with removal of the main steam isolation valve closure time surveillance. NMC, however, proposes to deviate from TSTF-491 in that PBNP TS 3.7.3 and associated SRs do not include the main feedwater valve closure times, and thus TSTF-491 changes to TS 3.7.3 are not applicable to the PBNP TS.

3.0 REGULATORY ANALYSIS

3.1 No Significant Hazards Consideration Determination

NMC has reviewed the proposed no significant hazards consideration determination (NSHCD) published in the Federal Register as part of the CLIIP. NMC has concluded that the proposed NSHCD presented in the Federal Register notice is applicable to PBNP and is hereby incorporated by reference to satisfy the requirements of 10 CFR 50.91(a).

3.2 Verification and Commitments

As discussed in the notice of availability published in the Federal Register on December 29, 2006, for this TS improvement, plant-specific verifications were performed as follows: NMC has reviewed the safety evaluation (SE) published on October 5, 2006, (71 FR 193) as part of the CLIIP Notice for Comment. This included the NRC staff's SE and the supporting information provided to support TSTF-491. NMC has concluded that the justifications presented in the TSTF proposal and the model SE prepared by the NRC staff are applicable to PBNP, Units 1 and 2, and justify this amendment for the incorporation of the changes to PBNP TS 3.7.2. The TSTF-491 changes to TS 3.7.3 do not apply to the PBNP TS and are not proposed for adoption.

In addition, NMC has proposed TS Bases consistent with TSTF-491 which provide guidance and details on how to implement the new requirements. Finally, NMC has a Bases Control Program consistent with Section 5.5.13 of the Standard Technical Specifications (STS).

4.0 ENVIRONMENTAL EVALUATION

The amendment changes requirements with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20. The NRC staff has determined that the amendment adopting TSTF-491, Revision 2, involves no significant increase in the amounts and no significant change in the types of any effluents that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously issued a proposed finding that TSTF-491, Revision 2, involves no significant hazards considerations, and there has been no public comment on the finding in Federal Register Notice 71 FR 193, October 5, 2006. Accordingly, the 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 the issuance of the amendment.

5.0 REFERENCES

1. TSTF-491, Revision 2, "Removal of Main Steam and Main Feedwater Valve Isolation Times from Technical Specifications."

2. NRC Model Safety Evaluation Report.

ENCLOSURE 2

PROPOSED CHANGES TO TECHNICAL SPECIFICATION PAGES

1 Page Follows

ACTIONS

CONDITION	REQUIRED ACTION		COMPLETION TIME
C. (continued)	C.3	Verify MSIV and non-return check valve in the affected flowpath are closed and the MSIV is de-activated.	Once per 7 days
D. Required Action and associated Completion Time of Condition C not met.	D.1 <u>AND</u>	Be in MODE 3.	6 hours
	D.2	Be in MODE 4.	12 hours

SURVEILLANCE REQUIREMENTS

SURVEILLANCE		FREQUENCY
SR 3.7.2.1	----------NOTE---------- Only required to be performed in MODE 1. ---------- Verify closure time of each MSIV is ~~≤ 5.0 seconds~~ <u>within limits.</u>	In accordance with the Inservice Testing Program
SR 3.7.2.2	----------NOTE---------- Only required to be performed in MODE 1. ---------- Verify each MSIV actuates to the isolation position on an actual or simulated actuation signal.	18 months
SR 3.7.2.3	Verify each main steam non-return check valve can close.	In accordance with the Inservice Testing Program

ENCLOSURE 3

PROPOSED CHANGES TO TECHNICAL SPECIFICATION BASES

3 Pages Follow

BASES

ACTIONS (continued) The 8 hour Completion Time is consistent with that allowed in Condition A.

For inoperable MSIVs or non-return check valves that cannot be restored to OPERABLE status within the specified Completion Time, but are isolated, the flowpath must be verified on a periodic basis to be closed and the MSIV de-activated. This is necessary to ensure that the assumptions in the safety analysis remain valid. The 7 day Completion Time is reasonable, based on engineering judgment, in view of flowpath indications (MSIV position) available in the control room, and other administrative controls, to ensure that these valves are in the closed position.

D.1 and D.2

If the MSIVs or non-return check valves cannot be restored to OPERABLE status or are not closed within the associated Completion Time, the unit must be placed in a MODE in which the LCO does not apply. To achieve this status, the unit must be placed at least in MODE 3 within 6 hours, and in MODE 4 within 12 hours. The allowed Completion Times are reasonable, based on operating experience, to reach the required unit conditions from MODE 2 conditions in an orderly manner and without challenging unit systems.

SURVEILLANCE REQUIREMENTS SR 3.7.2.1

This SR verifies that the ~~MSIV~~ closure time of each MSIV is ~~≤ 5.0 seconds, as measured from the time of signal initiation until the valves indicate closed~~ within the time limit given in Reference 5 and is within that assumed in the accident and containment analyses. This ~~Surveillance~~ SR also verifies that the valve closure time is in accordance with the Inservice Testing Program. This SR is normally performed upon returning the unit to operation following a refueling outage. The MSIVs should not be tested at power, since even a part stroke exercise increases the risk of a valve closure when the unit is generating power. As the MSIVs are not tested at power, they are exempt from the ASME Code (Ref. 4), requirements during operation in MODE 1.

BASES

SURVEILLANCE REQUIREMENTS (continued)

The Frequency is in accordance with the Inservice Testing Program. Operating experience has shown that these components usually pass the Surveillance when performed at the Frequency required by the Inservice Testing Program. Therefore, the Frequency is acceptable from a reliability standpoint.

This test is conducted in MODE 2 under low steam flow conditions (≤ 5% steam flow) at operating temperature and pressure. This SR is modified by a Note that allows entry into and operation in MODES 2 and 3 prior to performing the SR. This allows a delay of testing to establish conditions consistent with those under which the acceptance criterion was generated.

SR 3.7.2.2

This SR verifies that each MSIV will actuate to its isolation position on a actuation isolation signal. The 18 month Frequency is based on a refueling cycle interval and the potential for an unplanned transient if the Surveillance were performed with the reactor at power. Operating experience has shown that these components normally pass this Surveillance when performed at the 18 month Frequency. Therefore, the Frequency was concluded to be acceptable from a reliability standpoint.

This SR is modified by a Note that allows entry into and operation in MODES 2 and 3 prior to performing the SR. This allows delaying testing until conditions where the testing can be performed are established.

SR 3.7.2.3

This SR verifies that each main steam non-return check valve can close. As the non-return check valves are not tested at power, they are exempt from the ASME Code (Ref. 4) requirements during operation in MODE 1, 2, or 3. The Frequency is in accordance with the Inservice Testing Program. Operating experience has shown that these components usually pass the Surveillance when performed at the Frequency required by the Inservice Testing Program. Therefore, the Frequency is acceptable from a reliability standpoint.

BASES

REFERENCES

1. FSAR, Section 10.1.
2. FSAR, Section 14.2.5.
3. 10 CFR 100.11.
4. ASME Boiler and Pressure Vessel Code, Section XI, OM Code, Code for Operation and Maintenance of Nuclear Power Plants.
5. ~~NUREG-0800, Standard Review Plan 15.1.5, Appendix A, "Radiological Consequence of Main Steam Line Failures Outside of a PWR", Rev. 2, July 1981.~~ TRM 4.7, Inservice Testing Program