

**DAIRYLAND POWER COOPERATIVE**

*La Crosse, Wisconsin*

54601

December 7, 1979

POOR ORIGINAL

In reply, please  
refer to LAC-6683

DOCKET NO. 50-409

Director of Nuclear Reactor Regulation  
ATTN: Mr. Dennis L. Ziemann, Chief  
Operating Reactors Branch #2  
Division of Operating Reactors  
U. S. Nuclear Regulatory Commission  
Washington, D. C. 20555

SUBJECT: DAIRYLAND POWER COOPERATIVE  
LA CROSSE BOILING WATER REACTOR (LACBWR)  
PROVISIONAL OPERATING LICENSE NO. DPR-45  
APPLICATION FOR AMENDMENT TO LICENSE

Reference: (1) DPC Letter, LAC-6280, Linder to Ziemann,  
dated May 11, 1979.  
(2) DPC Letter, LAC-6429, Linder to Ziemann,  
dated July 27, 1979.  
(3) NRC Letter, Reid to Madgett,  
dated January 10, 1978.  
(4) License Amendment Fee, Check #21046,  
dated July 10, 1979.

Gentlemen:

An application to amend Provisional Operating License No. DPR-45 was requested in Reference 1. The requested amendment involved proposed changes to Technical Specifications for the La Crosse Boiling Water Reactor (LACBWR) which deal with the Inservice Inspection Program. Reference 2 submitted the plans and requests for relief of the inservice testing and inspection programs for the La Crosse Boiling Water Reactor.

Subsequently, we have identified two other areas where inservice testing requirements or ASME Section XI are impractical. Therefore, in accordance with the guidance of Reference 3, the following request is submitted.

Enclosure 3 of Reference 2 listed the pumps to be included in the pump inservice testing program. The below listed pumps are to be deleted from the "MONTHLY WHEN IN SERVICE" testing schedule:

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- . High Pressure Core Spray Pump 1A, 53-06-001
- . High Pressure Core Spray Pump 1B, 53-06-002
- . Alternate Core Spray Pump 1A, 38-06-001
- . High Pressure Service Water Pump 1B, 75-06-002

The proposed revised schedule for testing of the Alternate Core Spray Pump 1A, 38-06-001, and High Pressure Service Water Pump 1B, 75-06-002, is to require performance tests during each reactor plant cold shutdown.

The proposed revised schedule for testing of the two High Pressure Core Spray Pumps 1A and 1B, is to require performance tests during any reactor plant cold shutdown after accumulating ten hours of pump run time since the last test.

The quantities to be measured during the testing of any of the above pumps remains unchanged.

Important reasons for not testing any of the above pumps during reactor plant operations are as follows:

1. The nozzle connecting the High Pressure Core Spray (HPCS) system to the reactor vessel has a limited thermal cycle stress lifetime (see NES Report P-5101-258 dated June 3, 1977). Therefore, injecting cold core spray water into an operating reactor is unacceptable.
2. Any test loop for flow would necessitate flow diversion. This requires isolation valving which in turn reduces system redundancy.
3. The valving, whether automatic or manual, and the control circuitry for conducting the test all contribute to an increased probability that the testing itself or an imperfect restoration of the system after testing could leave core spray systems operationally impaired after a test.

The purpose of testing these pumps to ASME Section XI requirements is to determine pump degradation and not necessarily the actuation signals. Therefore we believe that the alternate testing for pump operability proposed above is satisfactory.

