



**Wisconsin  
Electric**  
POWER COMPANY

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10 CFR 50.59

VPNPD-89-522  
NRC-89-121

October 3, 1989

U.S. Nuclear Regulatory Commission  
Document Control Desk  
Mail Station Pl-137  
Washington, D.C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
MODIFICATION TO TECHNICAL SPECIFICATION CHANGE REQUEST 126  
REVISION TO HEATUP AND COOLDOWN LIMIT CURVES  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated August 3, 1989, Wisconsin Electric Power Company (Licensee) submitted Technical Specification Change Request (TSCR) 126. That request proposed new heatup and cooldown limit curves and related changes.

On August 31, 1989, Mr. Warren Swenson (NRC Project Manager) informed us that several apparent discrepancies existed between our proposed heatup limit curve and the NRC calculated curve. Specifically, our curve for the 100°F/Hr heatup was less limiting at higher temperatures. Upon further research and after review of data provided by Westinghouse Electric Corporation in a September 12, 1989 letter, it appears that the original T-RT<sub>NDT</sub> data for the 100°F/Hr heatup limit curve provided in Table 6-3 of WCAP-8738, contains several erroneous data points at higher temperatures. These errors were obscured in past submittals because margins were previously included for instrument uncertainties. Margins for instrument uncertainties were not included in TSCR #126, thus the discrepancies in the WCAP-8738 data became noticeable.

The new Westinghouse 100°F/Hr heatup data provided in their September 12, 1989 letter are more conservative at higher temperatures while the WCAP-8738 Table 6-3 data are more conservative at lower temperatures. We have therefore calculated a new T-RT<sub>NDT</sub> versus pressure data set using a conservative composite of the most limiting data from the 100°F/Hr heatup table found in WCAP-8738 and the data from the September 12, 1989 letter. The new heatup limit curve is again calculated using the methodologies of Regulatory Guide 1.99, Revision 2 and the calculational procedure of WCAP-8738 as described in our August 3, 1989 letter.

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On September 25, 1989, we discussed this approach with Mr. John Tsao, NRC's technical reviewer for this submittal, and compared selected data points from our new curve with the NRC curve. Mr. Tsao indicated that the new curve appeared acceptable and asked that we submit a modified Technical Specification Change Request to revise the heatup limit curve.

Accordingly, we have attached a revised Figure 15.3.1-1, "PBNP Unit Nos. 1 & 2 Heatup Limitations Applicable to 18.1 Effective Full Power Years (Approximately January 1995)." This replaces the Figure 15.3.1-1 proposed in our August 3, 1989 submittal; the remainder of that submittal is not changed.

We have evaluated this proposed amendment in accordance with the requirements of 10 CFR 50.91(a) against the criteria of 10 CFR 50.92. A proposed amendment will not involve a significant hazards situation if it does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

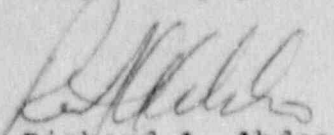
The proposed heatup curves were derived from a conservative composite of our most limiting T-RT<sub>NDT</sub> data using the methodology of WCAP-8738. This data was calculated using the most limiting fluence and weld data from either unit as input to the acceptable methodology of Regulatory Guide 1.99, Revision 2. The modification to the original change request discussed in this letter actually results in a heatup curve which is more conservative than the curve presented in our original application. Therefore, the consequences or probability of a previously evaluated accident will not be increased nor will a margin of safety be reduced.

The underlying purpose of these curves remains unchanged: to define an acceptable operating range of pressures and temperatures to protect the reactor vessels against non-ductile failure. Thus, a new or different kind of accident has not been created. Therefore, since the three criterion are not violated, we have determined that this change will not result in a significant hazards consideration.

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Please contact us if you have any questions regarding this  
submittal.

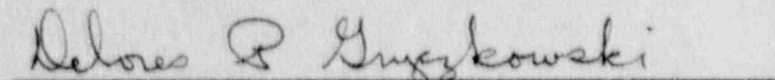
Very truly yours,

  
Richard A. Abdo  
President

Attachment

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector  
R. S. Cullen, PSCW

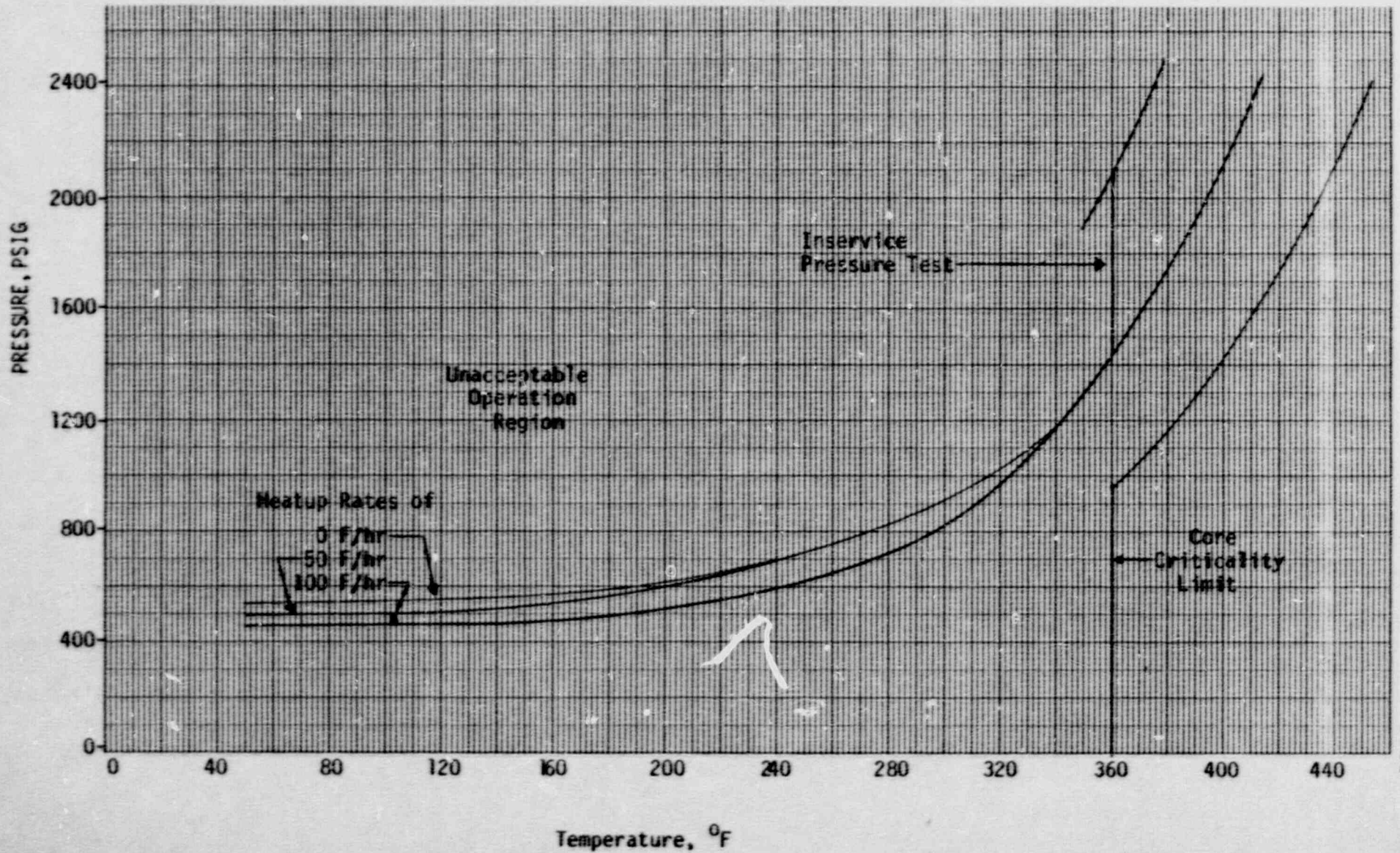
Subscribed and sworn to before me this  
3<sup>rd</sup> day of October, 1989.

  
Notary Public, State of Wisconsin

My Commission expires 5-27-90



Figure 15.3.1-1/PBNP Unit Nos. 1 & 2  
Heatup Limitations Applicable to  
18.1 Effective Full Power Years  
(Approximately January 1995)



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Figure 15.3.1-1/PBNP Unit Nos. 1 & 2  
Heatup Limitations Applicable to  
18.1 Effective Full Power Years  
(Approximately January 1995)

