

October 3, 1989

In reply, please
refer to LAC-12854

DOCKET NO. 50-409

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

Gentlemen:

SUBJECT: Dairyland Power Cooperative (DPC)
La Crosse Boiling Water Reactor (LACBWR)
Possession-Only License No. DPR-45
Request for Changes to Technical Specification Submittal

REFERENCES: (1) DPC Letter, LAC-12501, Taylor to Document Control Desk,
dated February 22, 1988
(2) Generic Letter No. 89-14: Line-Item Improvements in
Technical Specifications - Removal of the 3.25 Limit
on Extending Surveillance Intervals

In the letter of Reference 1, Dairyland submitted proposed Technical Specifications for SAFSTOR. It has become necessary to request minor changes to these proposed specifications. These changes involve Specification 3.5(b) and its associated bases, Section 3.5, and Specification 4.4.3.

Generic Letter No. 89-14 (Reference 2) suggests licensees submit proposed changes to the sections of their technical specifications that allow extension of surveillance intervals. That section of the proposed LACBWR Technical Specifications (Reference 1) is 3.5 (page 3-1) and its associated bases, Section 3.5 (page 3-2). Specification 3.5 of the proposed SAFSTOR Technical Specifications currently reads as follows:

3.5 Each Surveillance Requirement shall be performed within the specified time interval with:

- a. A maximum allowable extension not to exceed 25% of the surveillance interval.*
- b. A total maximum combined interval time for any 3 consecutive surveillance intervals not to exceed 3.25 times the specified surveillance interval.*

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Dairyland proposes the following specification in its place:

3.5 Each Surveillance Requirement shall be performed within the specified surveillance interval with a maximum allowable extension not to exceed 25 percent of the specified surveillance interval.

The bases section for the 3.5 specification currently reads as follows:

3.5 The provisions of this specification provide allowable tolerances for performing surveillance activities beyond those specified in the nominal surveillance interval. These tolerances are necessary to provide flexibility because of scheduling and performance consideration. The phrase "at least" associated with a surveillance frequency requirement does not negate these allowable tolerances for performing surveillance activities; instead it permits more frequent performance of surveillance activities than required by the specification.

The tolerance values, taken either individually or consecutively over three test intervals, are sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

Dairyland proposes the following in its place:

3.5 The provision of this specification provides an allowable tolerance for performing surveillance activities beyond those specified in the nominal surveillance interval. This tolerance is necessary to provide flexibility because of scheduling and performance considerations. The phrase "at least" associated with a surveillance frequency requirement does not negate these allowable tolerances for performing activities.

The tolerance value is sufficiently restrictive to ensure that the reliability associated with the surveillance activity is not significantly degraded beyond that obtained from the nominal specified interval.

The other requested change is to Specification 4.4.3 of the proposed SAFSTOR Technical Specifications. The proposed specification currently reads as follows:

4.4.3 The following spray and/or sprinkler systems shall be OPERABLE:

- a. The turbine lube oil reservoir.*
- b. The turbine lube oil storage room.*
- c. The reserve transformer.*
- d. 1A diesel generator room.*
- e. Electrical penetration area.*

Dairyland would amend this specification to include a sixth set of sprinklers that were recently added on a facility change. The specification would then read as follows:

4.4.3 The following spray and/or sprinkler systems shall be OPERABLE:

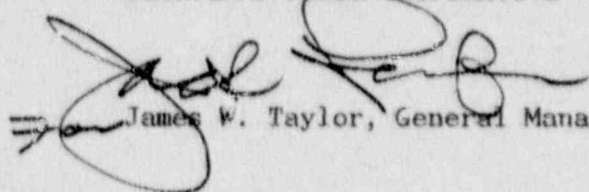
- a. The turbine lube oil reservoir.*
- b. The turbine lube oil storage room.*
- c. The reserve transformer.*
- d. 1A diesel generator room.*
- e. Electrical penetration area.*
- f. Crib house diesel fire pump area.*

Attached to this letter are the three affected pages with the proposed changes made to them. If the NRC agrees to these changes, please substitute these three pages for their counterparts in the proposed Technical Specifications submittal of Reference 1.

If you have any questions concerning this letter, please contact us at (608) 689-2331.

Sincerely,

DAIRYLAND POWER COOPERATIVE


James W. Taylor, General Manager

JWT:REC:dh

Attachments

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