

September 3, 1980

In reply, please
refer to LAC-7112

DOCKET NO. 50-409

Director of Nuclear Reactor Regulation
ATTN: Mr. Darrell G. Eisenhut, Director
Division of Licensing
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
ADDITIONAL TMI REQUIREMENTS

REFERENCES: (1) NRC Letter, Eisenhut to All Operating
Reactors, dated May 7, 1980.
(2) DPC Letter (LAC-7011), Linder to Eisenhut,
dated July 7, 1980.

Dear Mr. Eisenhut:

Our initial response (Reference 2) to your request for compliance with additional requirements coming from the Three Mile Island Lessons Learned (Reference 1) stated our schedule for submitting this information.

Enclosure 1 to this letter provides our response to several items.

If there are further questions, please contact us.

Very truly yours,

DAIRYLAND POWER COOPERATIVE

James W. Taylor
for Frank Linder, General Manager

FL:JDP:abs

Enclosure 1

CC: J. Keppler, Reg. Dir., NRC-DRO III

A001
S
1/1

8009090529P

ITEM	SUBJECT	RESPONSE
I.A.3.1	Revise Scope and Criteria for Licensing Examinations	Compliance with this item is complete. 7/29/80
I.C.5	Procedures for Feedback of Operating Experiences to Plant Staff	LACBWR will complete this review.
II.K.3.1	Installation and Testing of Automatic PORV Isolation System	Applies to PWR's only.
II.K.3.2	PWR Vendor Report on PORV Failure Reduction	Applies to PWR's only.
II.K.3.3	Reporting Safety and Relief Valve Failures and Challenges	(a&b) LACBWR does not utilize primary system relief valves. (c) LACBWR will promptly report to the NRC any future failure of a primary system relief or safety valve to close after pressure relief operation. (d) LACBWR will report all future indicated operations of primary system safety valves for pressure relief.
II.K.3.5	Automatic Trip of Reactor Coolant Pumps During LOCA	Applies to PWR's only.
II.K.3.9	Proportional Integral Derivative Controller Modification	Applies to Westinghouse PWR's only.
II.K.3.10	Proposed Anticipatory Trip Modification	Applies to Westinghouse PWR's only.
II.K.3.12	Confirm Existence of Anticipatory Trip upon Turbine Trip	Applies to Westinghouse PWR's only.
II.K.3.13	Separation of HPCI and RCIC System Initiation Levels - Analysis and Implementation	Applies to BWR's with RCIC and HPCI systems only.
II.K.3.14	Isolation of Isolation Condensers On High Radiation	This item proposes a change to increase the availability of isolation condensers as heat sinks. It states that currently isolation condensers are isolated by high radiation signals in the steam line leading to the condenser and that this point of signal should be changed to the shutdown condenser vent. (Cont'd)--

ITEM	SUBJECT	RESPONSE
II.K.3.14 (Cont'd)		The shutdown condenser at LACBWR does not have this isolation feature as part of its design. Isolation is accomplished manually upon indication of radiation levels at the vent. This modification to increase the availability of the isolation condenser is not required at LACBWR.
II.K.3.15	Modify Break Detection Logic to Prevent Spurious Isolation of HPCI and RCIC systems	Applies to BWR's with HPCI and RCIC systems only.
II.K.3.16	Reduction of Challenges and Failure of Relief Valves - Feasibility Study and System Modifications	LACBWR does not utilize primary system relief valves and this item does not apply.
II.K.3.17	Report on Outage of ECC Systems	LACBWR will provide the requested data specified.
II.K.3.18	Modification of ADS Logic	This item applies to BWR's with automatic depressurization systems.
II.K.3.19	Interlock of Recirculation Pump Loops	LACBWR is a two-loop Allis-Chalmers BWR which has specific Technical Specification restrictions requiring the nonisolation of one of its recirculation loops during any time in which the shutdown condenser is in service or either steam isolation valve is open. LACBWR is permitted to operate with less than all loops in service. Therefore, this item is not applicable. The safety assessment of this mode of operation was completed by the Systematic Evaluation Program under Topic IV-1.A.
II.K.3.20	Loss of Service Water for Big Rock Point	Applies to Big Rock Point only.

ITEM	SUBJECT	RESPONSE
II.K.3.2f	Restart of Core Spray and LPCI Systems On Low Level	<p>The high pressure core spray system at LACBWR has in the design of its pump control switches the desired feature. When the pump is switched to the off position, the control switch is spring loaded to return to automatic whenever the handle is released. A low water level in the reactor vessel immediately restarts the pump. Only by placing the handle in pullout position can the operation of the high pressure emergency core spray pumps be stopped. This system design is in compliance with the staff position for this item.</p> <p>The alternate core spray system consists of diesel engine driven pumps which obtain their water supply from the Mississippi River and pump the river water through automatic valves to the reactor. The system is designed to operate on high containment building pressure and low reactor water level.</p> <p>The design of the system is such that the diesel engine driven pumps start on a high containment building pressure signal, and the automatic valves open on a high containment building pressure signal and a low reactor water level signal at -12". When in operation, the valves will remain open until water level is greater than -12", and will cycle to maintain that level.</p> <p>The control valves are locked in auto and require obtaining keys to change their position. Since the valves cycle to maintain reactor water level, the engine driven pumps are left running.</p> <p>The engine driven pump control switches have an off position to permit surveillance testing of the engines. However, a red annunciator would indicate if the switches were off. As this system functions for water level control and no operator action is required to secure the pumps, it remains in automatic.</p>

ITEM	SUBJECT	RESPONSE
II.K.3.22	Automatic Switchover of RCIC System Suction	Applies to BWR's with RCIC systems only.
II.K.3.24	Affirm Adequacy of Space Cooling for HPCI and RCIC Systems	Applies to BWR's with RCIC and HPCI systems only.
II.K.3.25	Effect of Loss of AC Power On Pump Seals	Applies to PWR's only.
II.K.3.27	Provide Common Reference Level for Vessel Level Instrumentation	All operating water level transmitters at LACBWR already have a common elevation for their vessel taps. All but the "wide range indicators" were indexed for normal operating level. We have indexed this remaining indicator so all five operating water level transmitters have a common reference point. LACBWR is in compliance with this item.
II.K.3.28	Study and Verify Qualification of Accumulators in ADS Valves	LACBWR has an MDS rather than an ADS. This verification of qualification will be performed in the accumulators for the MDS valves.
II.K.3.29	Study to Demonstrate Performance of Isolation Condensers with Noncondensibles	LACBWR has in its shutdown condenser design automatic venting of non-condensibles. It also has remote manual capability to vent noncondensibles to ensure adequate natural circulation. This review giving consideration to removal of noncondensibles was accomplished in the initial system design.
II.K.3.30	Revised Small Break LOCA Methods to Show Compliance with 10CFR50 Appendix K	LACBWR will review existing analysis methods.
II.K.3.31	Plant Specific Calculations to Show Compliance with 10 CFR 50.46	This item references 10 CFR 50.46 which is specifically directed towards reactors using zircalloy cladding. LACBWR will review this item applicability once Draft 4 of NUREG-0660 is issued.
II.K.3.44	Evaluation of Anticipated Transients with Single Failure to Verify No Fuel Damage	LACBWR will complete this evaluation.

<u>ITEM</u>	<u>SUBJECT</u>	<u>RESPONSE</u>
II.K.3.45	Evaluation of Depressurization With Other than ADS	LACBWR utilizes an MDS rather than an ADS. Its shutdown condenser provides an alternate to use of the MDS valves for depressurization. This use of an alternate will be documented by procedural reference.
II.K.3.46	Response to List of Concerns from ACRS Consultant	Michelson's concerns have been addressed at LACBWR. The results of this review, as it applies to this facility were submitted to the NRC in LAC-6688, dated December 11, 1979. This item is complete.
II.K.3.57	Identify Water Sources Prior to Manual Actuation of ADS	LACBWR uses an MDS rather than an ADS. The procedure for actuation of the MDS requires that the alternate core spray system be functioning prior to use of the MDS. Implementation of this item is already in effect.
III.D.3.4	Control Room Habitability	This review will be accomplished.