



**Wisconsin  
Electric**  
POWER COMPANY

231 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201

(414) 221-2345

VPNPD-89-636  
NRC-89-152

10 CFR 50.59  
10 CFR 50.90

December 7, 1989

U. S. NUCLEAR REGULATORY COMMISSION  
Document Control Desk  
Mail Stop P1-137  
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
TECHNICAL SPECIFICATION CHANGE REQUEST 135  
OPERABILITY TESTING OF  
REDUNDANT SAFETY-RELATED EQUIPMENT  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements set forth in 10 CFR 50.59(c) and 10 CFR 50.90, Wisconsin Electric hereby requests an amendment to Facility Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2 respectively. The amendments would allow the removal of one train of certain safety-related equipment from service without testing the redundant equipment to demonstrate operability. The presently required testing related to limiting conditions for operation in these instances is redundant to the technical specification-required surveillances, does not significantly increase the probability a component will operate when called upon to perform its function, and may result in both system trains being out of service for the duration of the test.

We have enclosed herewith a copy of the affected technical specification pages. The changes are identified by a margin bar in the right-hand margin. A detailed discussion of the requested changes follows.

Technical Specifications 15.3.3.A.2.b, 15.3.3.A.3.a, and 15.3.3.B.2.b have been changed to allowed a Safety-Injection (SI) Pump, Residual Heat Removal (RHR) Pump, or Containment Spray (CS) Pump respectively to be out of service provided the other pump is operable and eliminates the requirements to test the redundant pump prior to removing a pump from service and, in the case of the containment spray pumps, while a pump is out of service.

A601

Technical Specifications 15.3.3.A.2.c, 15.3.3.A.3.c, and 15.3.3.B.2.c have been modified to allow a valve to be inoperable in the SI, RHR, and CS systems provided the valves in these systems serving the duplicate function are operable and eliminate the requirement to test the valves providing the duplicate function to demonstrate operability.

Finally, Technical Specification 15.3.3.B.2.a has been modified to allow one containment accident fan cooler to be out of service for the prescribed duration providing the other accident fan coolers are operable, eliminating the requirement to test the other accident fan coolers prior to performing maintenance or periodically while the accident fan cooler is out of service. The bases for Section 15.3.3 have been changed accordingly.

During our review of the event detailed in LER 266/89-001-00 dated April 24, 1989, in which the "B" train emergency diesel was removed from service for maintenance while testing the "A" train containment spray pump resulting in both trains of containment spray being out of service at the same time, we determined that situations exist where the performance of a technical specification test, as required by a limiting condition of operation, could be interpreted as rendering both trains of a required system inoperable for the duration of the test. The above-listed technical specifications presently require testing of the like component in the other train when the component in one train is determined to be inoperable or prior to taking the component out of service for maintenance. This can result in both trains of the affected systems being out of service for the duration of the test.

Required system and component tests for SI, RHR, CS, and Containment Accident Fans are described in Technical Specification 15.4.5. These tests include system operation tests on a refueling basis and monthly operability tests for containment fan cooler accident fans and RHR, SI, and CS pumps. Required valves in these systems are also specified to be checked for operability monthly. As stated in the bases for Section 15.4.5 of the PBNP technical specifications, the active components in these systems are tested monthly to check operation and verify the pumps are in satisfactory running order. In addition, it states, "The test interval of one month is based on the judgement that more frequent testing would not significantly increase reliability (i.e., the probability a component will operate when required), yet more frequent testing would result in increased wear over time." We conclude that testing of these components prior to removing a like component from service or during the time the like component is out of service does not significantly increase the probability that the component will

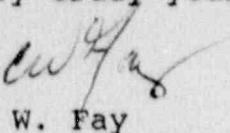
NRC Document Control Desk  
December 7, 1989  
Page 3

remain operable and is inconsistent with the technical specification bases for surveillance and testing of these components. We, therefore request that the testing requirements for SI, RHR, and CS pumps and containment fan cooler accident fans contained in Section 15.3.3 of the technical specifications be deleted.

We have evaluated these changes as required in 10 CFR 50.91(a) against the criteria in 10 CFR 50.92 and have determined that the proposed amendment does not involve a significant hazards consideration. These amendments do not involve a significant increase in the probability or consequences of an accident previously evaluated. As summarized in the bases for Section 15.4.5, more frequent testing than that required in that section does not significantly increase equipment reliability. Deleting the test requirements from Section 15.3.3 insures that an operable train of a system is not purposefully rendered out of service for some time period when the other train is known to be out of service. Deleting the test requirements geared to the limiting conditions of operation in Section 15.3.3, therefore, cannot cause a significant increase in the probability or consequences of an accident previously evaluated. Because these changes do not involve any modification to plant systems or equipment, and the proposed changes related only to the timing of the tests, they cannot create the possibility of a new or different kind of accident from any accident previously evaluated. Finally, these changes do not involve a significant reduction in a margin of safety because equipment reliability is not significantly reduced and there is adequate assurance that one train of required systems will be able to perform its function when called upon.

Should you have any questions or require clarification of any information contained herein, please contact us.

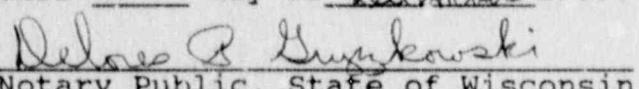
Very truly yours,

  
C. W. Fay  
Vice President  
Nuclear Power

Enclosures

Copies to NRC Regional Administrator, Region III; Resident Insp.

R.S. Culler, PSCW  
Subscribed and sworn to before me  
this 11<sup>th</sup> day of December 1989.

  
Delores A. Guskowski  
Notary Public, State of Wisconsin  
My Commission expires 5-27-90.