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October 14, 1980

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. D. G. Eisenhut, Director
Division of Licensing

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
DECAY HEAT REMOVAL SYSTEM OPERABILITY
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter to all operating pressurized water reactor licensees dated June 11, 1980, requested submittal of proposed Technical Specification changes for all facilities to provide for redundancy in decay heat removal capability in all modes of operation. We have reviewed the proposed model technical specifications provided with your letter and concluded that the present Point Beach Nuclear Plant Technical Specifications already address your concerns and require no changes.

Following are our comments on the proposed standardized technical specifications:

1. The Limiting Condition for Operation (LCO) for power and startup operation specifies all reactor coolant loops shall be in operation or the units shall be in hot standby within one hour. Point Beach Technical Specification 15.3.1.c requires both reactor coolant pumps to be in operation when reactor power is above 10% and at least one reactor coolant pump in operation above 1% power. Since heat transfer analysis shows that reactor heat equivalent to 10% of rated power can be removed with natural circulation only, these Specifications, as written, provide sufficient heat removal capabilities. The Point Beach Nuclear Plant comprises two, two-loop units and are not equipped with loop stop valves. The reactor coolant loops cannot be isolated from the reactor vessel. Therefore, both reactor coolant circulating loops are always available for either forced or natural circulation.

2. The LCO for Mode 3 operation, or hot standby with average coolant temperature above 350°F, requires two of four reactor coolant loops and their associated steam generators and reactor coolant pump to be in operation. The LCO also prohibits operations involving a reduction in boron concentration with no reactor coolant loops in operation. Point Beach Technical Specification 15.3.1.A.1.a requires either one reactor coolant pump or the residual heat removal system to be in operation when a reduction is made in boron concentration of the reactor coolant. Specification 15.3.1.A.2 requires one steam generator be operable whenever the average reactor coolant temperature is above 350°F.
3. For operation in Modes 4 and 5, which corresponds to operation at less than 350°F or less than 200°F, respectively, the standard specification LCO requires two coolant loops operable and at least one coolant loop in operation. If these conditions cannot be met, corrective action must be initiated to return the required loop to operable status or the plant be placed in cold shutdown. If no coolant loop is in operation, all operations involving a reduction in boron concentration are to be suspended. As mentioned previously, Point Beach Specification 15.3.1.A.1.a requires either a reactor coolant loop or the residual heat removal system to be in operation before a reduction in boron concentration may be initiated.
4. Standardized specification 3.9.8 addresses LCO's for the refueling condition, Mode 6. It requires at least one residual heat removal loop to be in operation and two loops operable. Point Beach Technical Specification 15.3.8 requires at least one residual heat removal pump operation during refueling operations. If this condition cannot be met, the Specification requires cessation of refueling and initiation of corrective action and forbids any operations which may increase the reactivity of the core. In the refueling condition with the reactor vessel head removed for movement of fuel, a large amount of borated water is available as a heat sink to minimize the potential for core heatup. Therefore, in the event of a failure of the operating residual heat removal pump, sufficient time is available to complete corrective action to restore the residual heat removal system to service.

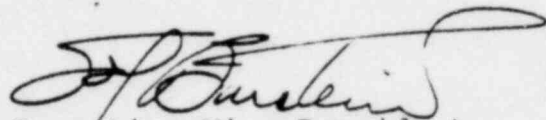
Mr. Harold R. Denton

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We wish to note that, as discussed in our response to IE Bulletin 80-12 dated June 5, 1980, we have implemented a change to the Point Beach Nuclear Plant procedure concerning equipment isolations to assure redundancy and integrity of decay heat removal capability. This procedural change imposes the precaution and limitation that at least two redundant methods of removing reactor core decay heat are maintained at all times. Any deviation from this requirement must be approved in advance by the Manager's Supervisory Staff. These procedural requirements together with the existing Plant Technical Specifications and the Plant design and operation provide adequate assurance that the decay heat removal capability of the Point Beach Nuclear Plant will be maintained.

Very truly yours,



Executive Vice President

Sol Burstein

Copy to NRC Resident Inspector