DAIRYLAND DODEPCO

COOPERATIVE . P.O. BOX 817 . 2815 EAST AV SOUTH . LA CROSSE WISCONSIN 54601

(608) 288-4000

October 16, 1981

In reply, please refer to LAC-7876

DOCKET NO. 50-409

U. S. Nuclear Regulatory Commission ATTN: Mr. Darrell G. Eisenhut, Director Division of Licensing Office of Nuclear Reactor Regulation Division of Operating Reactors Washington, D. C. 20555

SUBJECT: DAIRYLAND POWER COOPERATIVE LA CROSSE BOILING WATER REACTOR (LACBWR) PROVISIONAL OPERATING LICENSE NO. DPR-45 THREE MILE ISLAND LESSONS LEARNED REQUIREMENT



- REFERENCES: (1) NRC Letter, Denton to All Operating Nuclear Power Plants, dated October 30, 1979. (2) NRC Letter, Eisenhut to All Licensees of
 - Operating Plants, dated October 31, 1980.

Gentlemen:

The Three Mile Island Lessons Learned Action Plan (Reference 1) and the Clarification of Three Mile Island Action Plan Requirements (Reference 2, Section III.B.3) require the installation of sampling systems for post accident analysis of reactor coolant, containment atmosphere and aseous effluent. The date specified for having these systems functional and in service is January 1, 1982. We request for the LACBWR facility an extension of time until the Spring of 1982 refueling outage currently scheduled to commence in mid-March 1982. The length of time of the requested extension is approximately three months. The time between announcement and required implementation (26 months) will not be greatly increased by this extension.

The justifications for the extension are listed below for each system:

REACTOR VESSEL LIQUID SAMPLING SYSTEM

(1) The installation of the piping for this system requires connection to the primary system and penetration of containment. Both of these tasks require the reactor to be in a cold shutdown condition. No reactor shutdowns are contemplated until the refueling outage. A shutdown of up to six weeks would have to be scheduled to accomodate this work.

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- (2) Performing this work during the non-peak electrical demand spring season would avoid taking the unit out-of-service during the winter peak period of December-February.
- (3) Due to the availability and expected progressive delivery schedule of required equipment greater prefabrication of components in the maintenance shops would be possible if some field installation is deferred until the refueling outage. This would reduce the need to perform work in radiation areas during plant operation in order to meet an arbitrary deadline. The effect of delaying installation would be a reduction in total personnel dose.
- (4) This extension will reduce the liklihood of tripping the reactor because preliminary wiring in the vicinity of safety related components can be deferred until shutdown. If unscheduled reactor shutdowns occur some advance wiring can be accomplished. This action will reduce the potential for placing transients on the fuel.
- (5) In the interim, the post-accident high range radiation monitors manufactured by General Atomic Company are available for core damage assessment. These monitors were placed into service in April 1981 well ahead of the scheduled deadline of January 1, 1982. The purpose for these monitors is to indicate area radiation levels in containment to follow the course of an accident. LACBWR monitors are correlated to indicate the relationship between indicated reading and core condition. Expected responses are identified for loss of coolant, loss of coolant plus 1% fuel damage, loss of coolant plus 10% fuel damage and loss of coolant plus 100% fuel damage. This ability to correlate to fuel condition approximate the function listed for the post-accident sampling system (Page 27 of Reference 1). The containment atmospheric sampling system is expected to be available by January 1, 1982 for assessing core condition by analysis of isotopes present.

STACK EFFLUENT SAMPLING SYSTEM

- (1) The installation of the piping for this system requires work be performed in two high radiation areas which exist while the plant is in operation. This work, therefore, requires a plant shutdown. Approximately six weeks will be required to install the reactor vessel liquid and stack effluent sampling systems.
- (2) Performing this work during the non-peak electrical demand Spring season would avoid taking the unit out-of-service during the Winter peak period of December-February.
- (3) The connection of this system to the stack monitor system currently in service would require the stack monitor to be removed from service for at least one day. While Technical Specifications permit limited periods of out-of-service time for the stack monitor during plant operation we prefer not to interrupt it's service. The new stack

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monitor with an extended range noble gas channel was recently placed in service. The addition of this monitor was also a Three Mile Island Lessons Learned Requirement (Reference 1). In granting this extension the need to remove the stack monitor from service during operation can be avoided.

(4) In the interim the extended range noble gas monitor has been added to the stack monitor capability as a Three Mile Island Lessons Learned Requirement (Reference 1). In addition, an extensive leak rate and containment isolation valve testing program is conducted in accordance with Technical Specifications to provide assurance of containment integrity. As both of these requirements compliment each other in achieving the goal of isolating and containing or analyzing the gaseous effluents, the combination of these factors supports this request for an extension.

SUMMARY

Dairyland Power Cooperative is requesting an extension from January 1, 1982 until completion of the Spring of 1982 refueling outage of LACBWR to install the Reactor Vessel Liquid and Stack Effluent Sampling System. The benefits of providing the electrical power in a peak demand period, minimizing radiation exposure to workers (ALARA) and reducing the potential for unscheduled shutdowns justifies the request for this extension. There are adequate means available to obtain similar information that is to be provided by the Post-Accident Sampling Systems in the interim.

Based on these factors, Dairyland Power Cooperative should be granted the requested extension.

If there are any questions regarding this submittal, please contact us.

Very truly yours,

DAIRYLAND POWER COOPERATIVE

Frank Junde

Frank Linder, General Manager

FL:JDP:eme

cc: J. Keppler, Region III NRC Resident Inspector