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10 CFR 50.59, 50.90

June 1, 1990

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

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 139
SAFETY INJECTION ACCUMULATOR
LIMITING CONDITIONS FOR OPERATION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.59(c) and 10 CFR 50.90, Wisconsin Electric Power Company (Licensee) requests an amendment to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2 respectively. This amendment request includes proposed changes to the Point Beach Technical Specifications which will clarify the limiting condition for operation of safety injection accumulators in Specification 15.3.3.A.2 and add an example of the application of this limiting condition for operation to the bases for Specification 15.3.3. A change is also proposed to correct a reference in the bases to Specification 15.3.0.A. Technical Specification pages with the proposed changes identified by margin bars in the right-hand margin are attached. A discussion of the changes follows.

During evaluation of a recent event detailed in LER-89-003-00 dated August 9, 1989 for Point Beach Nuclear Plant, Unit 2, in which the accumulators were cross-connected through their fill and vent lines in order to regain level indication on one of the accumulators following a level instrument failure, we determined that cross-connecting the accumulators may limit the water available for injection during a LOCA resulting from a cold leg break. The LOCA analysis for the Point Beach Nuclear Plant assumes that in the event of a cold leg break, the accumulator on the faulted loop injects directly to containment via the pipe break while the accumulator on the non-faulted loop injects to

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the reactor core. In the event of a cold leg break with accumulators cross-connected, assuming reactor system pressure prevents injection into the non-faulted loop, water and gas will flow from the accumulator on the non-faulted loop to the accumulator on the faulted loop. This limits the water available for injection into the reactor core from the accumulators. Thus, cross-connecting accumulators results in one accumulator being potentially inoperable and unable to perform its design function in the event of a LOCA resulting from a cold leg break.

Point Beach Technical Specification 15.3.3.A.2.a presently allows an accumulator to be isolated for up to one hour for a check valve leakage check. Since isolation of an accumulator will prevent it from injecting during a LOCA, the accumulator is inoperable for the time the accumulator is isolated. This situation bounds the case where accumulators are cross-connected. We, therefore, propose to modify Technical Specification 15.3.3.A.2.a to include a one-hour limiting condition for operation anytime an accumulator is determined to be inoperable for any reason. This one-hour limit is consistent with the standard Technical Specifications and the bases to Technical Specification 15.3.0, which implies that the one-hour limit for isolating an accumulator also applies to anytime an accumulator is considered inoperable.

The bases for Technical Specification 15.3.3 have been modified to include an example application of a Limiting Condition for Operation using Specification 15.3.3.A.2.a.

The bases for Technical Specification 15.3.0.A incorrectly references Technical Specification 15.3.3.A.2.e for the limiting condition for operation related to the safety injection accumulators. This reference should be changed to 15.3.3.A.2.a. Specification 15.3.3.a.2.e was renumbered by Amendments 66 and 71 to DPR-24 and DPR-27 respectively.

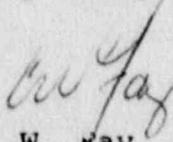
We have evaluated the changes proposed in this amendment application in accordance with the requirements of 10 CFR 50.91(a) using the standards in 10 CFR 50.92 and have determined that the changes do not result in a significant hazards consideration. A proposed amendment does not result in a significant hazards consideration if operation of the facility in accordance with the proposed amendment does not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety. The modification to the limiting condition for operation

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of the safety injection accumulators to include anytime an accumulator is inoperable imposes an additional limitation or NRC restriction not presently included in the Technical Specifications. The addition of an example to the bases is administrative and does not change the meaning or intent of the bases or specification. The correction of the reference in the bases is for consistency only and is, therefore, purely administrative. These are examples of amendments not likely to involve a significant hazards consideration as provided in the statement of consideration published at 51 FR 7744.

If you have any questions regarding this proposed change, please contact us.

Very truly yours,



C. W. Ray
Vice President
Nuclear Power

Enclosures

Copies to NRC Regional Administrator, Region III
NRC Resident Inspector

Subscribed and sworn to before me
this 1st day of June, 1990.

Helores B. Guszczowski
Notary Public, State of Wisconsin

My Commission expires 5-22-94.