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10 CFR 50.90

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Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATIONS CHANGE REQUEST 164
MODIFICATIONS TO TECHNICAL SPECIFICATION SECTION 15.3.0
"GENERAL CONSIDERATIONS"
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 50.90, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2 respectively, to incorporate changes to the plant Technical Specifications. The proposed revisions will modify Technical Specification 15.3.0, "General Considerations," to incorporate requirements similar to those contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications." Marked-up Technical Specifications pages, a safety evaluation, and the No Significant Hazards Consideration are enclosed.

DESCRIPTION OF CURRENT LICENSE CONDITION

Specifications 15.3.0.A and 15.3.0.B delineate the actions to be taken if a Limiting Condition for Operation (LCO) is entered and cannot be exited within the specified time period, and the LCO prescribes no specific actions. These specifications also delineate actions to be taken if an LCO cannot be satisfied because of equipment failures or limitations beyond those specified in the permissible conditions of the applicable LCO.

Specification 15.3.0.C delineates conditions which must be satisfied to permit continued operation, consistent with the LCO action statements, for power sources when a normal or emergency power source is not operable.

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Specification 15.3.0.D addresses the concerns associated with a momentary loss of power to a component when immediate action is initiated, resulting in re-energization from an alternate source, tripping the channel of logic, or initiating operator action as specified in TS Table 15.3.5-2, "Instrument Operation Conditions for Reactor Trip."

DESCRIPTION OF PROPOSED CHANGES

This Technical Specification change request proposes to revise the specifications in Section 15.3.0 to incorporate requirements contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications." This change request also proposes to revise the entire bases for Section 15.3.0 in order to support the proposed new requirements. Editorial changes to the bases for Section 15.3.3 are also proposed to support this change. The proposed technical specifications and the associated bases sections are attached.

The proposed revisions to Specifications 15.3.0.A and 15.3.0.B delineate the actions to be taken for circumstances not directly provided for in the action statements of a Limiting Condition for Operation (LCO) and whose occurrence would violate the intent of the specification. These two proposed specifications encompass the information contained in 15.3.0.A and 15.3.0.B of the current Point Beach Technical Specifications and delineate the time limits for placing the unit(s) in a safe condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its associated action statements.

Upon entering Specification 15.3.0.A or 15.3.0.B, one hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This proposed amount of time is identical to the NUREG 1431, Revision 0, requirements. The proposed time limits of 7 hours and 37 hours for reaching hot and cold shutdown, respectively, are also consistent with the time limits specified in NUREG 1431, Revision 0.

Since Point Beach Nuclear Plant is a dual unit site, there may be potential situations that would require the shutdown of both units. Therefore, we propose revisions to Specifications 15.3.0.A and 15.3.0.B to provide action statements to cover these situations. The proposed specifications would allow an orderly and sequential shutdown of each unit to take place. The proposed specifications would require that a change in operation be initiated for both units within one hour of entering Specification 15.3.0.A or 15.3.0.B.

To address those instances where a dual unit shutdown may be required, Specifications 15.3.0.A and 15.3.0.B propose different time limits for both units to be in hot shutdown. One of the units is required to be in hot shutdown within 7 hours with the second unit required to be in hot shutdown within 10 hours. The two different time limits will allow plant operators to stagger major evolutions during the two shutdowns. The proposed time limit of 37 hours for both units to be in cold shutdown is consistent with NUREG 1431, Revision 0, requirements. The proposed revision to Specification 15.3.0.C specifies actions to be performed if an LCO cannot be met. Specification 15.3.0.C is consistent with NUREG 1431, Revision 0, requirements and proposes that, upon discovery of a Limiting Condition for Operation, the associated actions shall be met. The actions establish those measures that must be performed within specified time limits when the requirements of an LCO are not met. This specification states that completion of the required actions within the specified time limits constitutes compliance with a specification, and completion of the required actions is not required when an LCO is met within the specified action times, unless otherwise specified. Completing specified actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual specification.

The revisions proposed for Specification 15.3.0.D are simply editorial in nature. This proposed specification has the identical requirements of Specification 15.3.0.C in the current Point Beach Technical Specifications. A change in format of the specification is proposed in order to match the format of the other specifications within Section 15.3.0. Similarly, Specification 15.3.0.E is identical to Specification 15.3.0.D in the current Point Beach Technical Specifications.

Specification 15.3.0.F is proposed to allow equipment to be returned to service when it has been removed from service or declared inoperable to comply with required actions. The sole purpose of Specification 15.3.0.F is to provide an exception to Specification 15.3.0.C to allow the performance of testing to demonstrate the operability of the equipment being returned to service, or the operability of other equipment.

In support of the proposed revisions discussed above, a complete rewrite to the bases section of Section 15.3.0 is proposed. The proposed bases section will contain information to explain and clarify the proposed specifications. The information is similar to the material contained in the associated bases section of NUREG 1431, Revision 0.

BASIS AND JUSTIFICATION

The basis and justification for the proposed revisions is discussed in the enclosed safety evaluation. It has been determined that the proposed amendments do not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in individual or cumulative occupational exposure. Therefore, we conclude that the proposed amendments meet the requirements of 10 CFR 51.22(c)(9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

In conclusion, we believe that the proposed revisions to Section 15.3.0 will significantly enhance the overall operation of Point Beach Nuclear Plant. Therefore, we request that you promptly process this change request.

Please contact us if there are any questions.

Sincerely,

Bob Link
Vice President
Nuclear Power

FDP/jg

Enclosures

cc: NRC Regional Administrator
NRC Resident Inspector
Public Service Commission of Wisconsin

Subscribed and sworn before me on
this 26th day of JANUARY 1994.

Jacqueline Gorecki
Notary Public, State of Wisconsin

My commission expires 10-27-96.

TECHNICAL SPECIFICATIONS CHANGE REQUEST 164
SAFETY EVALUATION

INTRODUCTION

Wisconsin Electric Power Company (Licensee) has applied for amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. The amendments propose to modify Technical Specification Section 15.3.0, "General Considerations," to incorporate requirements contained in NUREG 1431, "Westinghouse Owner's Group Improved Standard Technical Specifications." The bases section for 15.3.0 is also being completely rewritten to support the proposed revisions to the specifications.

EVALUATION

Specifications 15.3.0.A and 15.3.0.B are proposed to delineate the actions to be taken for circumstances not directly provided for in the action statements of a Limiting Condition for Operation (LCO) and whose occurrence would violate the intent of the specification. These two proposed specifications encompass the information contained in 15.3.0.A and 15.3.0.B of the current Point Beach Technical Specifications, and delineate the time limits for placing the unit(s) in a safe condition when operation cannot be maintained within the limits for safe operation as defined by the LCO and its associated action statements.

Upon entering Specification 15.3.0.A or 15.3.0.B, one hour is allowed to prepare for an orderly shutdown before initiating a change in unit operation. This amount of time is identical to the NUREG 1431, Revision 0, requirements and provides time to permit the plant operator to coordinate the reduction in electrical generation with system control to ensure the stability and availability of the electrical grid.

The proposed time limits specified to reach hot and cold shutdown permit the shutdown to proceed in a controlled and orderly manner that is well within the capabilities of the unit, assuming that only the minimum required equipment is operable. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant transient that could challenge plant safety systems. The proposed time limits of 7 hours and 37 hours for reaching hot and cold shutdown, respectively, are consistent with the time limits specified in NUREG 1431, Revision 0. This change request proposes to increase the amount of time to reach hot shutdown from 3 hours to 7 hours. The amount of time to reach cold shutdown would decrease from 48 hours to 37 hours. The slightly longer time to reach hot shutdown is more than offset by the shorter time to cold shutdown, thereby reducing the total amount of time a unit may be operated in a condition in which a system or component required to mitigate the consequences of an accident is unavailable, or that is otherwise prohibited by the specifications. The slightly longer time to reach hot shutdown from power operation is consistent with normal plant operating procedures and practices.

Since Point Beach Nuclear Plant is a dual unit site, there may be potential situations that would require the shutdown of both units. Therefore, we propose revisions to Specifications 15.3.0.A and 15.3.0.B to provide action statements to cover these situations. The proposed specifications would allow an orderly and sequential shutdown of each unit to take place. This would ensure that the plant operators are not overloaded during the shutdown process and would allow the shutdowns to proceed in a controlled and orderly manner without challenging any plant safety systems. NRC Inspection Manual Part 9900, 10 CFR Part 2, Appendix C, "Enforcement Discretion," states that the NRC should grant a request for the exercise of enforcement discretion to allow for the orderly and sequential shutdown of multiple units when multiple units are required to be shutdown. The proposed specifications would require that a change in operation be initiated for both units within one hour of entering Specification 15.3.0.A or 15.3.0.B. This requirement would ensure that a power reduction is commenced on both units within one hour.

To address those instances where a dual unit shutdown may be required, Specifications 15.3.0.A and 15.3.0.B specify different time limits for both units to be in hot shutdown. One of the units is required to be in hot shutdown within 7 hours with the second unit required to be in hot shutdown within 10 hours. The two different time limits will allow plant operators to stagger major evolutions during the two shutdowns, providing operational flexibility to ensure that plant operators are not overloaded during the shutdown process. The proposed 7-hour time limit for one unit to be in hot shutdown is consistent with NUREG 1431, Revision 0, requirements. The proposed 10-hour time limit for the second unit to be in hot shutdown provides a slightly longer period of time that allows each unit to be sequentially taken off line in an orderly manner. Additionally, the proposed time limit of 37 hours for both units to be in cold shutdown is consistent with NUREG 1431, Revision 0, requirements.

The proposed revision to Specification 15.3.0.C specifies actions to be performed if an LCO cannot be met. Specification 15.3.0.C is consistent with NUREG 1431, Revision 0, requirements and proposes that, upon discovery of a Limiting Condition for Operation, the associated actions shall be met. The actions establish those measures that must be performed within specified time limits when the requirements of an LCO are not met. This specification states that completion of the required actions within the specified time limits constitutes compliance with a specification, and completion of the required actions is not required when an LCO is met within the specified action times, unless otherwise specified. Completing specified actions is not required when an LCO is met or is no longer applicable, unless otherwise stated in the individual specification.

The revisions proposed for Specification 15.3.0.D are simply editorial in nature. This proposed specification, which addresses emergency power source inoperability requirements, has the identical requirements of Specification 15.3.0.C in the current Point Beach Technical Specifications. A change in format

of the specification is proposed in order to match the format of the other specifications within Section 15.3.0. Similarly, Specification 15.3.0.E, which addresses requirements following a momentary loss of normal or emergency power, is identical to Specification 15.3.0.D in the current Point Beach Technical Specifications.

Specification 15.3.0.F is proposed to allow equipment to be returned to service when it has been removed from service or declared inoperable to comply with required actions. The sole purpose of Specification 15.3.0.F is to provide an exception to Specification 15.3.0.C to allow the performance of testing to demonstrate the operability of the equipment being returned to service, or the operability of other equipment. The amount of time that equipment is returned to service for testing, in conflict with the requirements of the action statements, will be limited to the time absolutely necessary to perform the allowable testing. Specification 15.3.0.F does not provide time to perform any other preventive or corrective maintenance.

In support of the specification revisions discussed above, a complete rewrite to the bases section of Section 15.3.0 is proposed. The proposed bases section will contain information to explain and clarify the proposed specifications. The information is similar to the material contained in the associated bases section of NUREG 1431, Revision 0.

Additionally, a revision to the bases of Section 15.3.3 is also proposed to remove references to action times of 3 and 48 hours. Once revised, the bases will only refer to Specifications 15.3.0.A and 15.3.0.B. Therefore, this revision is only editorial in nature. All of the remaining changes proposed in Section 15.3.0 are editorial in nature and are being proposed to clarify portions of the section's existing specifications.

CONCLUSIONS

In summary, the above proposed changes to the Point Beach Technical Specifications are being made to improve Section 15.3.0, "General Considerations," by incorporating guidance contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications." Incorporating this information into the Point Beach Technical Specifications will clarify the requirements of the section and are essentially administrative in nature. Therefore, these revisions will ensure and enhance the continued safe operation of Point Beach Nuclear Plant.

TECHNICAL SPECIFICATION CHANGE REQUEST 164
"NO SIGNIFICANT HAZARDS CONSIDERATION"

In accordance with the requirements of 10 CFR 50.91(a), Wisconsin Electric Power Company (Licensee) has evaluated the proposed changes against the standards of 10 CFR 50.92 and has determined that the operation of Point Beach Nuclear Plant, Units 1 and 2, in accordance with the proposed amendments does not present a significant hazards consideration. The analysis of the requirements of 10 CFR 50.92 and the basis for this conclusion are as follows:

1. Operation of this facility under the proposed Technical Specifications change will not create a significant increase in the probability or consequences of an accident previously evaluated. This proposed change will incorporate requirements contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications," into the Point Beach Technical Specifications Section 15.3.0, "General Considerations." The proposed revisions will not remove any existing requirements. Several new requirements will be added.

   However, the proposed revisions will allow a longer period of time for the affected unit(s) to be placed in hot shutdown should one of the applicable Limiting Conditions for Operation not be met. This longer time limit is identical to the time limit specified in NUREG 1431, Revision 0, and permits the shutdown to proceed in a controlled and orderly manner that is well within the capabilities of the unit(s), assuming that only the minimum required equipment is operable. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant transient that could challenge plant safety systems. The amount of time to reach cold shutdown would decrease from 48 hours to 37 hours. The slightly longer time to reach hot shutdown is more than offset by the shorter time to cold shutdown, thereby reducing the total amount of time a unit may be operated in a condition in which a system or component required to mitigate the consequences of an accident is unavailable, or that is otherwise prohibited by the specifications.

   Should a shutdown of both units be required, 15.3.0.A and 15.3.0.B allow an orderly and sequential shutdown of each unit to take place. This ensures that the plant operators are not overloaded during the shutdown process and allows the units shutdowns to proceed in a controlled and orderly manner. The revised specifications will clarify the existing specifications and will add some additional requirements, enhancing the effectiveness of the Point Beach Technical Specifications. There is no physical change to the facility, its systems, or its operation. Thus, an increased probability or consequences of an accident previously evaluated cannot occur.

2. Operation of this facility under the proposed Technical Specifications change will not create the possibility of a new or different kind of accident from any accident previously evaluated. This proposed change will incorporate requirements contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications," into the Point Beach Technical Specifications Section 15.3.0, "General Considerations." The proposed revisions will not remove any existing requirements. Several new requirements will be added.

   However, the proposed revisions will allow a longer period of time for the affected unit(s) to be placed in hot shutdown should one of the applicable Limiting Conditions for Operation not be met. This longer time limit is identical to the time limit specified in NUREG 1431, Revision 0, and permits the shutdown to proceed in a controlled and orderly manner that is well within the capabilities of the unit(s), assuming that only the minimum required equipment is operable. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant transient that could challenge plant safety systems. The amount of time to reach cold shutdown would decrease from 48 hours to 37 hours. The slightly longer time to reach hot shutdown is more than offset by the shorter time to cold shutdown, thereby reducing the total amount of time a unit may be operated in a condition in which a system or component required to mitigate the consequences of an accident is unavailable, or that is otherwise prohibited by the specifications.

   Should a shutdown of both units be required, 15.3.0.A and 15.3.0.B allow an orderly and sequential shutdown of each unit to take place. This ensures that the plant operators are not overloaded during the shutdown process and allows the units shutdown to proceed in a controlled and orderly manner. The revised specifications will clarify the existing specifications and will add some additional requirements, enhancing the effectiveness of the Point Beach Technical Specifications. There is no physical change to the facility, its systems, or its operation. Thus, a new or different kind of accident cannot occur.

3. Operation of this facility under the proposed Technical Specifications change will not create a significant reduction in a margin of safety. This proposed change will incorporate requirements contained in NUREG 1431, Revision 0, "Westinghouse Owner's Group Improved Standard Technical Specifications," into the Point Beach Technical Specifications Section 15.3.0, "General Considerations." The proposed revisions will not remove any existing requirements. Several new requirements will be added.

However, the proposed revisions will allow a longer period of time for the affected unit(s) to be placed in hot shutdown should one of the applicable Limiting Conditions for Operation not be met. This longer time limit is identical to the time limit specified in NUREG 1431, Revision 0, and permits the shutdown to proceed in a controlled and orderly manner that is well within the capabilities of the unit(s), assuming that only the minimum required equipment is operable. This reduces thermal stresses on components of the Reactor Coolant System and the potential for a plant transient that could challenge plant safety systems. The amount of time to reach cold shutdown would decrease from 48 hours to 37 hours. The slightly longer time to reach hot shutdown is more than offset by the shorter time to cold shutdown, thereby reducing the total amount of time a unit may be operated in a condition in which a system or component required to mitigate the consequences of an accident is unavailable, or that is otherwise prohibited by the specifications.

Should a shutdown of both units be required, 15.3.0.A and 15.3.0.B allow an orderly and sequential shutdown of each unit to take place. This ensures that the plant operators are not overloaded during the shutdown process and allows the units shutdowns to proceed in a controlled and orderly manner. The revised specifications will clarify the existing specifications and will add some additional requirements, enhancing the effectiveness of the Point Beach Technical Specifications. There is no physical change to the facility, its systems, or its operation. Thus, a significant reduction in a margin of safety cannot occur.