

October 29, 1982

In reply, please
refer to LAC-8679

DOCKET NO. 50-409

Director of Nuclear Reactor Regulation
ATTN: Mr. Dennis M. Crutchfield, Chief
Operating Reactors Branch #5
Division of Licensing
U. S. Nuclear Regulatory Commission
Washington, D. C. 20555

SUBJECT: DAIRYLAND POWER COOPERATIVE
LA CROSSE BOILING WATER REACTOR (LACBWR)
PROVISIONAL OPERATING LICENSE NO. DPR-45
APPLICATION FOR AMENDMENT TO LICENSE

- References:
- (1) NRC Letter, Eisenhut to Linder,
dated August 24, 1982
 - (2) NRC Generic Letter, No. 82-17, Eisenhut to All Licensees,
dated October 1, 1982
 - (3) 10 CFR 50, Section 50.90
 - (4) NRC Letter, Crutchfield to Linder,
dated July 30, 1982
 - (5) DPC Letter, LAC-8590, Linder to Crutchfield,
dated September 15, 1982
 - (6) DPC Letter, LAC-7025, Linder to Crutchfield,
dated July 14, 1980
 - (7) 10 CFR 170, Section 170.22

Gentlemen:

Reference 1 requested that proposed Technical Specification changes be submitted to Containment Leak Testing Specifications. Reference 2 requested that a change be submitted covering the frequency of emergency preparedness program audits. Therefore, in accordance with the provisions of Reference 3, an application to amend Provisional Operating License No. DPR-45 for the La Crosse Boiling Water Reactor is hereby filed with three (3) signed original applications, together with thirty-seven (37) copies.

The enclosed revised Technical Specifications dealing with leak rate testing incorporate the revisions Reference 1 considered necessary with respect to Type B test acceptance criteria and leakage experienced during Type A tests. In addition, several grammatical changes were made to condense excess verbage and promote clearer understanding. The enclosed revision page 43 also reflects the deletion of Section 5.2.7, which was requested in Reference 5.

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The proposed change also eliminates four Type B tests. The main steam line, feedwater line, and heating steam and condensate return penetrations and ventilation system inlet and exhaust duct flanges have not exhibited leakage during Type B tests. Therefore, the Type A test should be sufficient to determine their integrity. In addition, all but the ventilation flanges are welded penetrations, which should not exhibit any leakage.

The proposed Technical Specification Section 6.5.2.8.e has been revised to increase the frequency of Emergency Plan audits to at least once per 12 months per the request contained in Reference 2.

This letter will formally document the request for the temporary Technical Specification change to Section 4.2.2.15 DPC requested May 19, 1981. Amendment No. 29 (Reference 4) incorporated the temporary change into the Technical Specifications.

DPC also proposes revisions to Technical Specification Sections 4.2.6.7, 4.2.6.8, and the bases for 4.2.6.9. The basis of Section 4.2.6.9 is clarified to promote understanding. The current wording of 4.2.6.7 and 4.2.6.8 is awkward and subject to misinterpretation. Differences in interpretation can exist even when attempting to take the most conservative approach. Therefore, DPC proposes the new attached wording, which outlines conservative actions to be taken when a nuclear channel is inoperable. The actions specified are a balance between the goals of maintaining instrument redundancy and preventing unnecessary reactor transients. The attached revised page 36 of Technical Specifications also contains the changes which were proposed in Reference 5 to that page.

The basis of the proposed wording is as follows. If during power operation with the nuclear instrument channels in 2 of 4 trip logic, the scram contacts of nuclear channel 5 or 6 are placed in the closed position, the result would be 1 of 3 of the remaining channels would need to sense a high flux condition for a scram to occur. If power was then deescalated below the level of the logic change to 1 of 2 logic, a reactor scram would occur if the channel output was not bypassed. Therefore, the proposed Technical Specification states that the tripped channel's output should be bypassed prior to entering 1 of 2 logic, subject to Section 4.2.6.1 requirements, which limit the amount of time a channel can be bypassed to 24 hours in 30 days.

If the trip contacts of nuclear channel 7 or 8, however, are placed in the closed position during power operation, a power-flow reactor scram would occur. Therefore, the proposed Technical Specification states that if nuclear channel 7 or 8 is inoperable in a manner affecting the operability of its corresponding power-flow channel, the power-flow channel shall be bypassed pursuant to the time limitations of Section 4.2.6.1 (24 hours in 30 days) and the scram contacts of the nuclear channel placed in the trip position. The proposed specification does not require this action if nuclear channel 7 or 8 is inoperable in a manner not affecting the corresponding power-flow channel, because it is felt that an effective 2 of 3 logic on the nuclear channels and 1 of 2 logic on power-flow is more desirable than 1 of 3 logic on the nuclear channels and 1 of 1 logic on power-flow.

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Proposed revisions to Sections 5.2.12 and 5.2.13 are also attached to this letter. The change to Section 5.2.12 eliminates the semi-annual test of control rod scram times. Elimination of the semi-annual test would prevent the possibility of occurrence of a reactor shutdown strictly for control rod testing purposes. The elimination of the semi-annual test has no safety significance, because the required control rod scram testing frequency remains greater than that specified in Standard Technical Specifications. The proposed Section 5.2.13 removes a requirement for Cycle 5 operation only, which is no longer applicable.

Reference 5 proposed transferring the testing requirements for the Alternate Core Spray System (Low Pressure Coolant Injection) to Section 5.2.23.3, but neglected to delete Section 5.2.8. The attached proposed revision deletes Section 5.2.8. Sections 5.2.8, 5.2.12 and 5.2.13 are contained on page 43 of current Technical Specifications. The attached revised page 43 also contains and updates the changes which were proposed to page 43 in Reference 6.

The proposed changes to the Containment Leak Testing and emergency preparedness auditing specifications have been determined not to require a fee, per Footnote No. 2 of Reference 7, since they result from written Nuclear Regulatory Commission requests, do not involve a significant hazards consideration, have only minor safety significance and are being requested for the convenience of the NRC.

The proposed changes to Sections 4.2.6.7, 4.2.6.8, and 4.2.6.9 are determined to be within the Class II category, since they are administrative in nature and proposed so that a uniform, conservative understanding of the requirements can be maintained. The proposed revisions to Sections 5.2.8, 5.2.12, and 5.2.13 also involve no safety significance and so are categorized as Class II. A check for \$1,200 will be forwarded to the Commission.

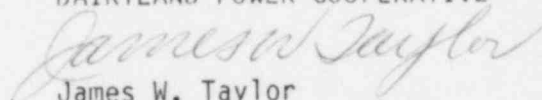
The information submitted in this application for license amendment has been reviewed by the LACBWR committees as prescribed in the Technical Specifications. The proposed revised pages of the Technical Specifications are attached to this letter.

DPC will implement the revised Containment Integrated Leakage Rate Testing (Type A) specification at the first scheduled Type A test following receipt of the approved license amendment. The frequency of emergency preparedness auditing will be increased commencing with the calendar year following approval of the proposed revision.

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

Very truly yours,

DAIRYLAND POWER COOPERATIVE



James W. Taylor
Assistant General Manager - Power

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WP-1.6.2

Director of Nuclear Reactor Regulation
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Enclosure: Proposed Revised Technical Specifications

cc: J. G. Keppler, Regional Administrator, NRC-DRO III
NRC Resident Inspector

STATE OF WISCONSIN)
)
COUNTY OF LA CROSSE)

Personally came before me this 29th day of October, 1982, the above named James W. Taylor, to me known to be the person who executed the foregoing instrument and acknowledged the same.



Cheryl L. Reed
Notary Public, La Crosse County,
Wisconsin
My Commission Expires 10/05/86