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VPNPD-94-050  
NRC-94-036

10 CFR 50.4  
10 CFR 50.90

April 28, 1994

Document Control Desk  
U.S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
MODIFICATION TO TECHNICAL SPECIFICATION CHANGE REQUEST 145  
PRESSURIZER PORV AND BLOCK VALVE REQUIREMENTS  
AND OVERPRESSURE MITIGATING SYSTEM OPERATIONS  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated May 30, 1991, as modified on May 7, 1993, Wisconsin Electric Power Company, Licensee for the Point Beach Nuclear Plant, requested amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2, respectively. The purpose of the requested amendments was to implement the Limiting Conditions for Operation (LCO) and surveillances consistent with those outlined in Generic Letter 90-06 for the Power Operated Relief Valves (PORV) and PORV block valves. We were recently informed by your staff that our submittal did not adequately implement the proposed LCO requirements.

Specifically, we proposed in our May 7, 1993, submittal, an LCO that would allow 32 hours to depressurize and open to containment atmosphere the reactor coolant system when both PORVs are inoperable and required for low-temperature overpressure protection. We requested the longer action time due to our concerns that eight hours may not be sufficient time to establish an open pathway to the containment atmosphere. The NRC staff, in Generic Letter 90-06, recommended that the required action be completed within eight hours.

Although we continue to have concerns with the length of time to accomplish the required action, we have decided to adopt the NRC staff guidance and have modified our proposed Specification 15.3.15.A.2.c accordingly. We have also modified the wording in

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the Specifications in Section 15.3.15 and associated to basis to clarify the required actions when a PORV(s) is found to be inoperable when used for low-temperature overpressure protection.

Specifically:

1. Proposed Specification 15.3.15.A.2 Parts a, b, and c have been modified to include action to depressurize and vent the reactor coolant system. Our previous proposal required that the RCS be depressurized to atmosphere. Venting was not addressed.
2. Proposed Specification 15.3.15.A.2.c has been modified to require depressurizing and venting the reactor coolant system within eight hours when both PORVs are determined to be inoperable. The eight-hour action conforms to the staff guidance in Generic Letter 90-06. Our previous proposal requested 24 hours.
3. Proposed Specification 15.3.15.A.3 has been modified to replace "open to atmosphere" with "vented" and remove other references to "atmosphere."

The bases has been modified to replace "open to atmosphere" with "vented" consistent with the revised wording of the proposed LCO action statements. Vented is defined in the bases as an opening in the reactor coolant system pressure boundary to containment atmosphere or the pressurizer relief tank (normal discharge path for the PORVs) with a relieving capability equivalent to a PORV.

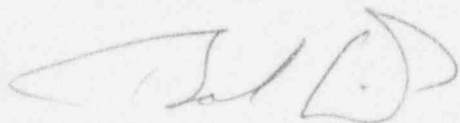
These changes are made in response to staff comments as well as to more closely reflect the staff's guidance provided in Generic Letter 90-06. These changes are consistent with, and do not change the intent of our previous submittals. Therefore, the safety evaluation and determination of no significant hazards contained in those submittals adequately address these changes.

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A complete copy of the Technical Specification pages with the changes made by this and previous submittals is attached.

Please contact us if you have any comments or require additional information.

Sincerely,




Bob Link  
Vice President  
Nuclear Power

TGM/jg

Attachment

cc: NRC Resident Inspector  
NRC Regional Administrator, Region III

Subscribed and sworn to before me  
this 28 day of April, 1994.

  
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Notary Public, State of Wisconsin

My commission expires 7-96.