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NRC-94-049

10 CFR 50.4  
10 CFR 50.90

August 1, 1994

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
ADDENDUM TO TECHNICAL SPECIFICATIONS CHANGE REQUEST 166  
MODIFICATION TO TS 15.3.0-LIMITING CONDITIONS FOR OPERATION,  
15.3.14-FIRE PROTECTION SYSTEM, 15.3.7-AUXILIARY ELECTRICAL  
SYSTEMS, AND 15.4.6-EMERGENCY POWER SYSTEM PERIODIC TESTS,  
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In letters dated May 26, 1994 and July 7, 1994, we submitted Technical Specifications Change Request 166 and an addendum, respectively. This letter provides additional clarification of the requirement to evaluate common cause failure.

In a meeting with the NRC on June 7, 1994, NRC personnel stated that appropriate consideration for common cause failure must be included. The following Technical Specification 15.3.7 basis paragraph was proposed in the July 7, 1994 addendum:

The LCOs for the standby emergency power supplies require the redundant standby emergency power supplies to be started within 24 hours of entry into these LCOs. If the standby emergency power supply LCO is exited within 24 hours, then the starting of the redundant standby emergency power supplies is not required. If the LCO was entered due to a standby emergency power supply failure and the LCO was exited within 24 hours, then an evaluation must be completed within 24 hours of entry into the LCO to show that the redundant standby power supplies are not susceptible to a common cause failure or the redundant standby emergency power supplies must be started to prove that a common cause failure does not exist within 24 hours of entry into the LCO.

In continuing discussions with NRC personnel reviewing this change request, it was recommended that we add the further clarification that the common cause failure evaluation be completed as soon as possible within 24 hours of entry into the LCO. Additionally, we would like to clarify the references to "a common cause failure" to

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A subsidiary of Wisconsin Energy Corporation

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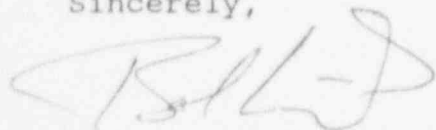
make these references specific to the situation that caused the LCO entry by using the wording, "that failure by common cause." With the incorporation of these changes, this paragraph states:

The LCOs for the standby emergency power supplies require the redundant standby emergency power supplies to be started within 24 hours of entry into these LCOs. If the standby emergency power supply LCO is exited within 24 hours, then the starting of the redundant standby emergency power supplies is not required. If the LCO was entered due to a standby emergency power supply failure and the LCO was exited within 24 hours, then an evaluation must be completed as soon as possible within 24 hours of entry into the LCO to show that the redundant standby power supplies are not susceptible to that failure by common cause or the redundant standby emergency power supplies must be started to prove that failure by common cause does not exist within 24 hours of entry into the LCO.

This change is a further clarification of the standby emergency power LCO. The safety evaluation for the original Technical Specification change request (166) has been reviewed and determined to still be applicable for this clarification. A mark-up of the Technical Specification page (15.3.7-7) that includes this change is attached. This mark-up page supersedes the same numbered page in the previous submittals.

Please feel free to contact us if you have any questions.

Sincerely,




Bob Link  
Vice President  
Nuclear Power

Attachment

CAC/jg

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

Subscribed and sworn before me on  
this 1<sup>st</sup> day of August 1994.

  
Notary Public, State of Wisconsin  
My commission expires 10/27/96.