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Gentlemen:

DOCKETS 50-266 AND 50-301
CLARIFICATION OF PROPOSED SPECIFICATIONS IN
TECHNICAL SPECIFICATIONS CHANGE REQUEST 164
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On January 26, 1994, Wisconsin Electric Power Company, the licensee for Point Beach Nuclear Plant, Units 1 and 2, submitted Technical Specifications Change Request 164 to the NRC. This change request proposes revisions that would modify Technical Specification 15.3.0, "General Considerations," to incorporate requirements similar to those contained in NUREG-1431, "Westinghouse Owner's Group Improved Standard Technical Specifications." Subsequent to our submittal, concerns were voiced relative to the some of the proposed revisions, by reviewers in the NRC's Technical Specifications Branch. We would like to take this opportunity to further explain our rationale for the proposed revisions in question.

Point Beach Nuclear Plant is comprised of two units that are monitored and controlled from a common control room. The operation of both units is the responsibility of a single operating crew. Because of the plant's vintage, several plant systems are shared by both units. Two such systems are the auxiliary feedwater system and the emergency diesel generators. As such, there may be situations where the inoperability of certain shared equipment could adversely affect both units, placing both units in a Limiting Condition for Operation action statement. In order to address such a situation, we decided to provide operational guidance concerning what actions must be taken should a shutdown of both units be required.

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NUREG-1431 was developed for a single unit site. As a result, it does not provide any guidance that can be used directly to address a dual-unit shutdown. However, we did use NUREG-1431 requirements as the basis for the development of plant-specific requirements for a dual-unit shutdown. LCO 3.0.3 of NUREG-1431 requires that action be initiated within one hour to place the unit in MODE 3 within seven hours, MODE 4 within thirteen hours, and MODE 5 within 37 hours. Based on these NUREG-1431 requirements, we proposed similar requirements for a single-unit shutdown, but also proposed requirements that would allow a staggered shutdown to be performed should a dual-unit shutdown be required.

In the revisions included in Technical Specifications Change Request 164, we proposed that action be initiated, on both units, within one hour to place one unit in hot shutdown within seven hours and the other unit in hot shutdown within ten hours. Both units would be required to be in cold shutdown within 37 hours, consistent with NUREG-1431. It is our intent, should we need to enter this specification, to commence ramping down both units within one hour. The ramp rates, however, would be different for the two units so that the first unit can be taken off line and placed in hot shutdown within seven hours and the second unit can be taken off line and placed in hot shutdown within ten hours. The seven-hour time period for the first unit would allow the unit to be ramped down in a controlled and orderly manner that is well within the maximum cooldown rate and the capabilities of the unit, assuming that only the minimum required equipment is operable.

We strongly believe that performing a dual-unit shutdown in such a manner would be safer because critical evolutions in a shutdown would not be performed on both units simultaneously. This will enhance communications in the control room, facilitating proper direction of operator actions and shift management oversight of the shutdown sequence. It will also ensure that appropriate operator resources are available to safely shutdown both units without challenging any plant systems.

During the process of shutting down a unit and placing it in hot shutdown, several critical evolutions must occur. One of the most critical evolutions during a unit's transition from full power to hot shutdown occurs when the turbine has been ramped down to approximately twenty percent power. At this point in the shutdown process, because of relatively low feedwater flow, automatic control of steam generator level is not practicable. As a result, steam generator level is controlled manually by a dedicated control room operator. Manual control of steam generator level must be continued until the affected unit's generator is taken off line and the unit is stable in hot shutdown. Experience has demonstrated

that the entire evolution takes approximately three hours. Once the evolution has been completed, similar operator actions will be commenced on the second unit. Another critical evolution that occurs during a unit shutdown is the singling of a unit's feedwater trains. This evolution normally takes place at fifty percent power.

Taking the units off line and placing them in hot shutdown sequentially will ensure that operations personnel can properly conduct dynamic evolutions, which require focus and oversight, in a controlled and safe manner.

In conclusion, we believe that revisions proposed in Technical Specifications Change Request 164 will only enhance the continued safe operation of Point Beach Nuclear Plant. Please contact us if there are any questions.

Sincerely,

for

Bob Link
Vice President
Nuclear Power

cc: NRC Resident Inspector
NRC Regional Administrator, Region III

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