Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

October 25, 1983

CERTIFIED MAIL

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. J. R. Miller, Chief
Operating Reactors Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 94
CRITERIA FOR TYPE A INTEGRATED LEAK RATE TESTING
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with Sections 50.59 and 50.90 of 10 CFR 50, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 to incorporate changes to the Technical Specifications for the Point Beach Nuclear Plant, Units 1 and 2. These changes are provided to meet the containment integrated leakage testing requirements of Appendix J to 10 CFR 50 and have been requested by the Commission. This letter also provides a status of our previous commitments concerning Appendix J compliance.

On June 25, 1982 the Nuclear Regulatory Commission issued amendments to the operating licenses for Point Beach Nuclear Plant, Units 1 and 2, which consisted of changes to the Technical Specifications to bring the Specifications in compliance, in part, with the requirements for containment integrated leakage rate testing as codified in 10 CFR 50, Appendix J. In a separate letter, also dated June 25, 1982, the Commission also approved exemptions from certain testing requirements of Appendix J. Besides granting several exemptions, this letter, signed by Mr. D. G. Eisenhut, also denied two other exemptions requested by Wisconsin Electric Power Company for the Point Beach Nuclear Plant. The exemptions denied concerned airlock testing requirements and substitution of a hydraulic test for the required pneumatic test of the containment spray isolation check valves. In addition, one exemption request concerning reduced

A017

Recd w/check

1/1

duration Type "A" containment integrated leak rate tests was not evaluated by the NRC. Both the June 25 amendment letter and the exemption letter directed that Wisconsin Electric inform the NRC of its plans for meeting the requirements of Appendix J, including submission of Technical Specification changes as necessary.

In our August 13, 1982 response to your June 25 letter, we stated that a plant design modification was issued and in the process of being reviewed and approved which would add a drain line and appropriate isolation devices to the containment spray system to permit the complete draining of the volume above the containment spray system isolation valves sealing surfaces. This modification is complete on both units and we are currently testing the valves in accordance with 10 CFR 50, Appendix J.

With respect to the Type "B" testing of our containment airlocks in accordance with Appendix J, our August 13 letter discussed our intent to use a vacuum test between the airlock door seals and described the method feasibility testing we were doing. In an October 21, 1982 letter, we committed to performing the vacuum testing of the airlock door seals and submitted a Technical Specification amendment application. By your April 1, 1983 letter, you accepted our proposed Technical Specification amendment. We have since completed the modifications necessary to implement the testing on Point Beach Unit 2 and are currently in full compliance with 10 CFR 50, Appendix J containment airlock testing requirements on that unit. The modifications necessary to implement the testing on Unit 1 will be completed during the fall 1983 refueling outage and we will be in full compliance with the testing requirements when the unit is returned to service.

The remaining item in your June 25 letter to be resolved deals with acceptance criteria for the duration of Type "A" containment integrated leak rate tests. The NRC did not evaluate our proposed methods and criteria. Instead, we were requested to commit to either full-duration 24-hour testing or tests of less than 24-hour duration conducted in accordance with the NRC approved Bechtel Topical Report BN-TOP-1. As stated in our August 13 letter, it is our opinion that BN-TOP-1 is a relatively old topical report (1972) and does not reflect "state-of-the-art" testing, nor provide verified criteria for short duration testing. BN-TOP-1 endorses the absolute method, total time technique for containment integrated leak rate testing, which is not currently being used at Point Beach. Point Beach uses the absolute method, mass point technique, which is currently the industry preferred technique.

At the time of our August 13 letter, Quadrex had just been contracted by EPRI to review past containment integrated leak rate tests to define and validate a set of technical test duration

criteria indicating when an integrated leak rate test may be terminated. We requested that our response and associated Technical Specification amendments be postponed until after the completion of this project. The project, designated EPRI Research Project No. 1393-5, is now complete. An EPRI report on the findings of this project should be issued in about six weeks. We have reviewed the February 2, 1983 draft report on this project and consider that the criteria established for the absolute method, mass point technique assures an acceptable Type "A" test and has been adequately validated. Thus, we propose that this criteria be incorporated into our Technical Specifications and have provided a proposed amendment. We also propose that the criteria of BN-TOP-1 also be incorporated, thus, in the event that it becomes desirable to use the absolute method, total time technique, a reduced duration acceptance criteria will exist. Proposed Technical Specification revised pages incorporating these changes are enclosed as Attachment 1.

It is our observation that the Bechtel BN-TOP-1 criteria for the total time technique and the Quadrex criteria for the mass point technique are very similar in concept. A comparison of these techniques is presented in Attachment 2.

Also included in this amendment request is a proposed relocation of the containment purge supply and exhaust valve testing from Specification 15.4.4.X to Type "B" tests, Specification 15.4.4.II. We believe that the valves now belong in this section based on their mode of operation and because they have resilient seals. These valves are locked shut during operation and perform no automatic function. Thus, they are no more than penetrations with a mechanically operated flange that is tested after each use prior to reactor startup.

We are also asking for a change to Technical Specification 15.3.6.C to allow us to open one of the redundant valves in the purge supply and exhaust lines during operation for a limited amount of time to accomplish repairs required as a result of testing. The time limitations and shutdown requirement applied to Type "B" penetrations under Technical Specification 15.4.4.II.B.2 would be applied. The redundant valve will be maintained in a locked shut condition. For personnel safety, the open valve will not be relied on for any automatic action. As required by Technical Specification 15.4.4.II.B.1, a retest to demonstrate acceptable leak tightness will be performed after repair and for closure of an opened valve.

In accordance with the requirements of 10 CFR 50.91(a)(1) the licensee has prepared the following discussion concerning the issue of no significant hazards consideration as determined by the standards of 10 CFR 50.92. The Commission has previously

provided guidelines concerning the application of these standards in 48 Federal Register 14870. Among the examples cited that are considered likely not to involve a significant hazards consideration were changes that constitute an additional limitation or control not presently included in the Specifications and changes which are purely administrative to achieve consistency in the Specification. The changes proposed in this application are of this nature. The proposed changes concerning the duration for Type "A" testing impose additional test acceptance criteria not presently contained in the Specification and are in response to a specific NRC request for changes. The proposed changes involving the containment purge supply and exhaust valve testing are administrative to achieve consistency among Type "B" leakage tests across individual pressure containing or leakage limiting boundaries.

In accordance with the schedule of fees for reactor facility license amendments, as listed in 10 CFR 170.22, Licensee has determined that this license amendment approval for Point Beach Unit 1 should be classified as a Class II amendment. This classification is based on the determination that these proposed revisions to the Technical Specification are administrative in nature in that they are responsive to an NRC request. The proposed method of testing has been previously approved by the NRC and was discussed in the Technical Evaluation Report supporting the Safety Evaluation provided with License Amendments 61 and 66 to DPR-24 and DPR-27, respectively. Accordingly, these revisions to the Specifications have no safety or environmental significance which has not been previously considered and approved by the Commission staff. The amendment application for Point Beach Unit 2 is a duplicate of the Unit 1 request and, therefore, can be classified as a Class I approval. Accordingly, a check in the amount of $1,600 is enclosed as payment for the applicable Class I and II approval fees.

As further specified in the Commission's regulations, we enclose herewith three signed originals and 40 copies of this license amendment application. Please contact us if you have any questions concerning this submittal.

Very truly yours,

C. W. Fay

C. W. Fay

Vice President-Nuclear Power

Enclosure (Check No. 754052)

Copies to NRC Resident Inspector
C. F. Riederer, PSCW

Subscribed and sworn to before me
this 25th day of October 1983.

Dorothy Fleischmann
Notary Public, State of Wisconsin

My Commission expires July 1, 1984.