



231 W. Michigan, P.O. Box 2146, Milwaukee, WI 53201

(414) 221-2345

VPNPD-91- 431
NRC-91- 143

December 6, 1991

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

Gentlemen:

DOCKETS 50-266 AND 50-301
SUPPLEMENT TO TECHNICAL SPECIFICATION CHANGE REQUEST 143
AUXILIARY FEEDWATER PUMP TESTING
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated March 1, 1991, Wisconsin Electric Power Company, Licensee for the Point Beach Nuclear Plant, requested an amendment to Facility Operating Licenses DPR-24 and DPR-27 which would revise the Point Beach Technical Specifications to require quarterly testing of the auxiliary feedwater (AFW) pumps. This amendment application is presently in the process of being reviewed by the NRC-NRR staff.

During a recent review of the AFW Technical Specifications, Mr. Jack Gadzala, the Point Beach resident inspector, questioned the interpretation of Specification 15.3.4.C.2. This specification presents a modification to the limiting conditions for operation (LCO) for the AFW pumps during single unit operation. The intent of that specification is to permit one of the three operable AFW pumps associated with that unit to be out of service for a limited period of time. The specification potentially could be interpreted, however, to permit both the steam-driven AFW pump and one of the two motor-driven AFW pumps to be out of service at the same time.

Having more than one AFW pump out of service at one time is an undesirable situation because of the arrangement of the shared AFW system at Point Beach. Details of the AFW system are provided in FSAR Section 10.2 and Figure 10.2-5. Each of the two motor driven pumps supplies one of the two steam generators in each unit. Thus pump P-38A supplies the "A" steam generator in each unit and P-38B supplies the "B" steam generator in each unit. The steam-driven AFW pumps are unit-specific and supply both the "A" and "B" steam generators in its associated single unit. If both the steam-driven and one motor-driven AFW pump were out of service, only one of the steam generators in the operating unit could be supplied with auxiliary feedwater. If the postulated accident which necessitated the initiation of auxiliary feedwater also incapacitated that steam generator, one of the mechanisms for controlling reactor decay heat removal would then be degraded.

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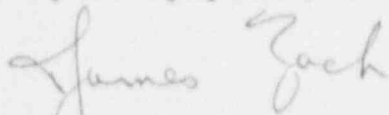
We are requesting in this supplement to Change Request 143 to clarify specification 15.3.4.C.2 by including the following sentence in this specification: "One of the three operable auxiliary feedwater pumps associated with a unit may be out-of-service for the below specified times." Including this sentence in Specification 15.3.4.C.2 would be analogous to the same limitation in Specification 15.3.4.C.1 and would remove any question of the misinterpretation of the specification. A revised mark-up of page 15.3.4-2a including this addition is attached.

Submitted as an enclosure to this application is our analysis of this amendment request pursuant to 10 CFR 50.91(a) regarding the issue of no significant hazards considerations. We have concluded that the change proposed in this application does not constitute a significant hazards consideration.

We have also concluded that since this change relates to the clarification of an existing specification, the amendment will meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b) no environmental impact statement or environmental assessment need be prepared in connection with the consideration of this amendment application.

We have discussed the basis for this submittal with Mr. Robert Samworth of your staff and have informed him that we intended to submit this clarification as an addition to our outstanding AFW amendment request. Please contact us if you have any questions concerning this application.

Very truly yours,




James J. Zach
Vice President
Nuclear Power

Enclosure

Copies to: NRC Regional Administrator, Region III
NRC Resident Inspector
Mr Lannie Smith, PSCW

Subscribed and sworn to before me
this 6th day of December, 1991.



Notary Public, State of Wisconsin

My Commission expires 5-22-94.

Enclosure
No Significant Hazards Determination

We have evaluated the change to the specifications proposed in the supplement to Change Request 143 in accordance with the requirements of 10 CFR 50.91(a) against the standards for significant hazards considerations in 10 CFR 50.92. This change is a clarification of an existing specification and does not affect any of the accident evaluations in FSAR Chapter 14. Our evaluation of this change against each of the criteria in 50.92 and the basis that the change involve "no significant hazards" is presented in the following paragraphs.

Criterion 1

Operation of a facility in accordance with a proposed amendment does not present a significant hazard if it does not result in an increase in the probability or consequences of an accident previously analyzed.

The intent of Specification 15.3.4.C.2 is to permit, as discussed in 15.3.0, "General Considerations," a temporary relaxation of the single failure criteria, consistent with overall reliability considerations, to allow limited time periods during which corrective actions may be taken to restore the AFW pumps to full operability. The proposed amendment to 15.3.4.C.2 serves to clarify that only one of the three operable AFW pumps associated with a single unit may be taken out of service at one time. This is consistent with the bases and with Specification 15.3.4.C.1 for two-unit operation. The proposed change requires no hardware or procedural change and can be characterized as administrative in nature. Accordingly, this change has no impact on the probability or consequences of previously evaluated accidents since the assumptions for the accidents are not altered and the LCO operability requirements provide the necessary assurance that the mitigative measures will be available.

Criterion 2

Operation of a facility in accordance with a proposed amendment does not present a significant hazard if it cannot create the possibility of an accident different from any previously evaluated.

This change does not result from any physical change or modification to the facility or its operation. The operability of equipment necessary for accident mitigation, such as the AFW pumps, is assured by periodic surveillance and testing. The continued availability of that equipment during plant operations is controlled by the limiting conditions for operation. Once operability is established through the successful completion of periodic testing and surveillance, the presumption is that the system will function as designed in the accident analyses. Since

there has been no change to the function, design or operation of the AFW system, one may conclude that a new or different kind of accident will not result from the proposed changes.

Criterion 3

Operation of the facility in accordance with a proposed amendment will not present a significant hazard if it does not result in a significant reduction in a margin of safety.

Under the existing Specification 15.3.4.C.2 one may argue that the specification would permit two AFW pumps to be out of service during single unit operation for a restricted period of time. Such a condition would not satisfy the intent of the specification which is to provide for redundant sources of auxiliary feedwater to an operating unit at all times. The availability of a single AFW pump for single unit operations would result in a reduction in the margin of safety. In that the proposed change will provide further assurance that during power operations no more than one AFW pump may be out of service at any one time, the change may actually be considered to assure the previously assumed margin of safety is available. Thus the previously accepted margins to safety are not reduced by these changes and it may be concluded that the proposed change does not involve a significant hazard consideration.