



Wisconsin  
Electric  
POWER COMPANY

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VPNPD-92-153

10 CFR 50.4, 50.59, 50.90

NRC-92-042

April 16, 1992

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
MODIFICATION TO TECH SPEC CHANGE REQUEST 149  
MAIN STEAM SYSTEM VALVE TESTING AND OPERABILITY  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated February 21, 1992, Wisconsin Electric Power Company, Licensee for Point Beach Nuclear Plant, Units 1 and 2, requested amendments to Facility Operating Licenses DPR-24 and DPR-27, respectively, to incorporate and clarify limiting conditions for operation (LCOs) and surveillance requirements for the main steam stop valves (MSSVs) and main steam non-return check valves (NRCVs) in our Technical Specifications. Upon review of our application, we determined that a modification to our Technical Specification Change Request was required to further clarify proposed Specification 15.3.4.D.

Proposed Specification 15.3.4.D defines LCOs for the MSSVs and NRCVs. The proposed specification would allow power operation to continue for up to four hours with an inoperable MSSV or NRCV. An additional six hours would be allowed to place the reactor in a hot shutdown condition. Operation in the hot shutdown condition would be allowed to continue as long as the inoperable valve remains closed. The specification also provides relaxation of the requirement to maintain the inoperable valve in the closed position to allow opening for testing to confirm operability. Specification 15.3.4.D, as defined in our February 21, 1992, submittal, authorizes opening of an inoperable MSSV for testing while in the LCO condition. The proposed change does not specifically authorize the opening of an inoperable NRCV for testing under the same conditions. It is our intent to allow opening of an inoperable NRCV for testing to confirm operability.

We, therefore, request the last sentence of the proposed specification be modified to read, "An inoperable main steam stop valve or non-return check valve may, however, be opened in the hot shutdown condition for the performance of testing to confirm operability." A Technical Specification page with proposed Specification 15.3.4.D, as modified by this submittal, is attached.

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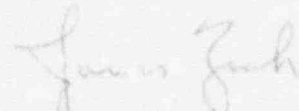
April 16

We have reviewed our analysis of the proposed changes in our February 21, 1992, application. Our analysis of the proposed changes assumed that the defined LCOs for the MSSVs and NRCVs were identical. This modification to our application ensures the LCOs are, in fact, identical; and the analysis remains applicable.

We have also reviewed the "No Significant Hazards Determination" included as Enclosure 1 to our February 21, 1992, application. Proposed Specification 15.3.4.D as contained in our February 21, 1992, submittal and modified by this submittal presents additional restrictions on plant operations not previously contained in the Technical Specifications. The operating philosophy of assuring valve operability is not changed by this submittal and may be enhanced. Therefore, the "No Significant Hazards Determination" and conclusions contained in our February 21, 1992, submittal apply to this modification to our application. Operation of Point Beach Nuclear Plant in accordance with the proposed amendments does not result in a significant hazard.

We request that this modification to our February 21, 1992, application be accepted. If you have any questions, please contact us.

Sincerely,




James J. Zach  
Vice President  
Nuclear Power

Attachment

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector  
Mr. L. L. Smith, PSCW

Subscribed and sworn to before me  
this 16<sup>th</sup> day of April, 1992.



Delores B. Hryciuk  
Notary Public, State of Wisconsin

My Commission expires 5-22-94.