



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

Gentlemen,

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 155
ONE-TIME EXTENSION - DIESEL GENERATOR G02 ANNUAL INSPECTION INTERVAL
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.59 (c) and 10 CFR 50.90, Wisconsin Electric Power Company (Licensee) requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2, respectively. These amendments will allow a one-time extension of the Diesel Generator G02 annual inspection requirement in Technical Specification Section 15.4.6, "Emergency Power System Periodic Tests," Specification A.3. The one-time extension will extend the annual requirement to 18 months. Technical Specification pages with the proposed changes, our safety evaluation and determination of no significant hazards are enclosed.

Technical Specification Section 15.4.6, Specification A.3, requires an inspection of the diesel generators to be performed in accordance with the manufacturers recommendations at least annually. This request proposes a one-time exemption from the annual inspection requirement to allow the present surveillance interval for Diesel Generator G02 (Train B) to be extended up to six months. This extension is being requested to allow sufficient time to return the on-site gas turbine generator (G05) to service and demonstrate its operability and reliability following its presently ongoing overhaul prior to removing G02 from service for its annual inspection. The gas turbine is a nonsafety-related on-site power source capable of supplying the on-site electrical distribution system including the safeguards buses. The gas turbine generator will be used as the alternate AC source, following demonstration of sufficient reliability, for satisfying the requirements of 10 CFR 50.63, "Loss of All Alternating Current Power." We believe that taking an emergency diesel generator out of service during the time that the gas turbine generator is out of service is imprudent based on risk management.

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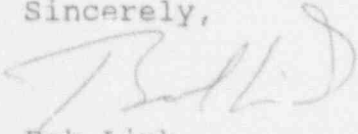
ADD 11

The last annual inspection of EDG G02 was completed on August 6, 1991. Technical Specification 15.4.1, "Surveillance Requirements," allows the adjustment of a surveillance interval by up to 25% to accommodate normal test schedules and major events such as refueling. This would allow us to delay the completion of the scheduled 1992 annual inspection to as late as November 6, 1992. The gas turbine generator overhaul is presently scheduled to be completed by September 27, 1992. We project that approximately one month will be necessary, following the completion of the G05 overhaul, to conduct a test program to demonstrate restored performance. The test program is based on guidance for diesel generators in NUMARC 87-00, "Guidelines and Technical Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors." We do not believe there is sufficient time for us to return the gas turbine generator to service and demonstrate an acceptable level of reliability prior to removing G02 from service for its annual inspection in accordance with Technical Specification 15.4.6.A.3. Therefore, we are requesting a one-time extension of the interval between inspections to 18 months from the previous annual inspection. MKW Power Systems, Incorporated, our diesel generator vendor nuclear supplier, has indicated that it is acceptable to perform our normal annual maintenance at 18 month intervals.

These proposed amendments do not result in a significant hazards consideration and will not result in a change in the types or increase in the amounts of any effluents released off-site or an increase in individual or cumulative occupational radiation exposure. Therefore, the categorical exclusion criteria of 10 CFR 51.22 (c) (9) are met. A environmental review is not required.

We remain in compliance with our present specifications for conducting the annual inspection of EDG G02 until November 6, 1992. We request these proposed amendments be reviewed and approved prior to October 25, 1992, so that sufficient time remains available to appropriately plan and conduct the required inspection for G02. If you have any questions or need additional information, please contact us.


Sincerely,


Bob Link
Vice President
Nuclear Power

TGM/jg

cc: NRC Regional Administrator, RIII
NRC Resident Inspector
L. L. Smith, PSCW

Subscribed and sworn to before me
this 11th day of Sept, 1992.


Notary Public, State of Wisconsin
My commission expires 6-2-96.

Enclosure 1

3. Each diesel generator shall be given an inspection, at least annually,* following the manufacturer's recommendations for this class of stand-by service.
4. Each fuel oil transfer pump shall be run monthly.

The above tests will be considered satisfactory if all applicable equipment operates as designed.

B. Station Batteries

1. Every month the voltage of each cell (to the nearest 0.05 volt), the specific gravity and temperature of a pilot cell in each battery and each battery voltage shall be measured and recorded.
2. Every 3 months the specific gravity, the height of electrolyte, and the amount of water added, for each cell, and the temperature of every fifth cell, shall be measured and recorded.
3. At each time data is recorded, new data shall be compared with old to detect signs of abuse or deterioration.
4. Each battery shall be subjected to a load test at intervals recommended by the manufacturer but not exceeding five years. The battery voltage as a function of time shall be monitored to establish that the capacity is sufficient to carry the loads as delineated in FSAR Table 8.2-3 for the specified length of time. All electrical connections will be checked for tightness.

* The surveillance interval for the 1992 annual inspection of diesel generator G02 may be extended up to 6 months, not to exceed a total time between annual inspections of 18 months.

Enclosure 2

Safety Evaluation In Support
Of One-Time Extension of the Annual Inspection Requirement
Of G02 To 18 Months

Technical Specification Section 15.4.6, "Emergency Power Systems Periodic Tests," Specification A.3, requires a diesel generator inspection at least annually in accordance with manufacturer's recommendation for the class of stand-by service. We propose to change this inspection frequency to allow a one-time extension of the present surveillance interval by up to six months, not to exceed 18 months from the previous inspection for Diesel Generator G02 (Train B). The emergency diesel generators at PBNP are General Motors Corporation, Electro-Motive Division, Model 999-20 rated at 2850 KW continuous, supplied by MKW Power Systems, Incorporated.

The on-site gas turbine generator (G05) is presently out of service and is undergoing a major overhaul to upgrade the turbine and generator and to improve its reliability. This overhaul is presently scheduled to be completed by September 27, 1992. G05 can be lined up to supply on-site electrical distribution, including the engineered safeguards buses, in the event of a loss of all AC power. Without the gas turbine generator capable of supplying reliable power, the only on-site source of power to the engineered safeguards buses that would be available in the event of a loss of off-site power during the time G02 is undergoing its annual inspection is diesel generator (G01). A temporary diesel generator has been installed and is available for supplying power to safe shutdown equipment through the Appendix R alternate shutdown switchgear. Although Diesel Generator G01 is highly reliable - a demonstrated reliability of 100% over the last 100 starts, the added assurance of an additional on-site source of power capable of supplying plant equipment, if needed, provides assurance that both PBNP units can be placed and maintained in a safe condition should a loss of off-site power occur concurrent with a single failure of the operable Diesel Generator G01.

Both Emergency Diesel Generators G01 and G02 have been maintained in accordance with manufacturers recommendation since installation at PBNP. No significant abnormalities or problems were noted during the annual inspection of G01 in the spring of 1992 or the last G02 annual inspection completed August 6, 1992. MKW Power Systems Inc., the diesel generator vendor, has evaluated extending the normally performed annual maintenance to 18 months and has determined the extension is acceptable.

An Emergency Diesel Generator reliability program has been established at PBNP, with a target reliability of 97.5%, in accordance with Regulatory Guide 1.155, "Station Blackout." Trigger values based on NUMARC 87-00, "Guidelines and Technical

Bases for NUMARC Initiatives Addressing Station Blackout at Light Water Reactors," have been established based on the last 20, 50, and 100 starts/load runs to indicate a reduction in diesel generator reliability. No trigger values have been exceeded on Diesel Generators G01 or G02 at PBNP.

Based on the maintenance history of the diesel generators, including the results of the most recent annual inspections, the diesel generator vendor's evaluation of our annual maintenance program and the high reliability of the diesel generators as monitored by our diesel generator reliability program, there is a high degree of assurance that Diesel Generator G02 will remain operable during the requested six-month extension of the surveillance interval. Operation of Diesel Generator G02 for the requested additional six months between inspections, for this inspection interval, does not present an undue risk to the safe operation of the Point Beach Nuclear Plant.

Enclosure 3

No Significant Hazards Determination In Support
Of One-Time Extension Of the Annual Inspection Requirement
For G02 To 18 Months

We have evaluated the proposed changes in accordance with the requirements of 10 CFR 50.91, "Notice for Public Comment; State Consultation," against the requirements of 10 CFR 50.92, "Issuance of Amendment," and have determined that operation of PBNP in accordance with the proposed amendments does not result in a significant hazard. Our evaluation against each of the standards in 10 CFR 50.92 supporting the determination of no significant hazards follows.

1. Operation of a facility in accordance with a proposed amendment does not result in a significant hazards consideration if it does not result in a significant increase in the probability or consequences of an accident previously evaluated.

Extending the present G02 annual inspection interval to a maximum of 18 months is not expected to have an adverse effect on diesel reliability. A formal diesel generator reliability program has been established which has not indicated a reduction in diesel generator reliability based on established trigger values. Previous inspections have found no abnormalities which would be expected to affect the diesel during this time. G02 has been maintained in accordance with the manufacturer's recommendations since installation and the diesel generator vendor concurs that an 18-month inspection is acceptable. A significant increase in the probability of a failure of the diesel generator to perform its function, as analyzed in the PBNP FSAR, during the six month additional time between inspections will not occur. Therefore, an increase in the probability or consequences of a previously analyzed accident will not occur.

2. Operation of a facility in accordance with a proposed amendment does not result in a significant hazards consideration if it does not result in a new or different kind of accident than any accident previously evaluated.

The proposed amendments will allow a one-time extension of the Diesel Generator G02 annual inspection interval to 18 months. These amendments will not result in, nor are they the result of any change in the design or function of the emergency diesel generators. The diesel generators will continue to function as designed and analyzed in the PBNP FSAR. A new or different kind of accident than any previously evaluated cannot result.

3. Operation of a facility in accordance with a proposed amendment does not result in a significant hazards consideration if it does not result in a significant reduction in a margin of safety.

The extension of the annual diesel inspection is needed to ensure that Gas Turbine Generator G05 is back in service prior to performing the annual inspection of Emergency Diesel Generator G02. G05 is capable of providing power to on-site electrical distribution systems, including the safeguards buses, and would be utilized in the event of a loss of off-site power and the operable emergency diesel generator. By delaying the Diesel Generator G02 inspection, which requires removing the diesel generator from service, a backup (G05), is available should a failure of G01 occur on demand, thereby improving the availability of on-site electrical power to required equipment under normal and accident conditions. Therefore, a margin of safety will not be significantly reduced.