

LICENSEE EVENT REPORT (LER)

FACILITY NAME (1) Point Beach Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 2 6 6	PAGE (3) 1 OF 0 3
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TITLE (4)
Subcritical Uncontrolled RCCA Withdrawal Accident Basis Identification

EVENT DATE (5)			LER NUMBER (6)			REPORT DATE (7)			OTHER FACILITIES INVOLVED (8)		
MONTH	DAY	YEAR	YEAR	SEQUENTIAL NUMBER	REVISION NUMBER	MONTH	DAY	YEAR	FACILITY NAMES		DOCKET NUMBER(S)
0 8	3 1	8 4	8 4	0 0 5	0 0	1 0	0 1	8 4	Point Beach Unit 2		0 5 0 0 0 3 0 1
THIS REPORT IS SUBMITTED PURSUANT TO THE REQUIREMENTS OF 10 CFR §: (Check one or more of the following) (11)											

OPERATING MODE (9) N	20.402(b)	20.406(c)	50.73(a)(2)(iv)	73.71(b)
POWER LEVEL (10) 1 1 0 1 0	20.406(a)(1)(i)	50.36(e)(1)	50.73(a)(2)(v)	73.71(c)
	20.406(a)(1)(ii)	50.36(c)(2)	50.73(a)(2)(vii)	OTHER (Specify in Abstract below and in Text, NRC Form 365A)
	20.406(a)(1)(iii)	50.73(a)(2)(i)	50.73(a)(2)(viii)(A)	
	20.406(a)(1)(iv)	X 50.73(a)(2)(ii)	50.73(a)(2)(viii)(B)	
	20.406(a)(1)(v)	50.73(a)(2)(iii)	50.73(a)(2)(x)	

LICENSEE CONTACT FOR THIS LER (12)

NAME C. W. Fay, Vice President-Nuclear Power	TELEPHONE NUMBER
	AREA CODE: 4 1 4 2 7 7 - 2 8 1 1

COMPLETE ONE LINE FOR EACH COMPONENT FAILURE DESCRIBED IN THIS REPORT (13)

CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS	CAUSE	SYSTEM	COMPONENT	MANUFACTURER	REPORTABLE TO NPRDS

SUPPLEMENTAL REPORT EXPECTED (14)

<input type="checkbox"/> YES (If yes, complete EXPECTED SUBMISSION DATE)	<input checked="" type="checkbox"/> NO	EXPECTED SUBMISSION DATE (15)	MONTH DAY YEAR
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ABSTRACT (Limit to 1400 spaces, i.e., approximately fifteen single-space typewritten lines) (16)

During review of the reload transition safety report submitted to the licensee by Westinghouse Electric Corporation, the reviewing engineer noted that the new subcritical uncontrolled rod cluster control assembly (RCCA) withdrawal accident analysis assumed operation of at least one reactor coolant pump in the basis of the analysis. This was more restrictive than actual past operation of both units as allowed by Technical Specification 15.3.1.A. Further clarification by Westinghouse resulted in determining that the present subcritical uncontrolled RCCA withdrawal accident analysis also included operation of at least one reactor coolant pump in its basis. Administrative controls were immediately implemented in an Operations special order to ensure that a control rod drive mechanism (CRDM) is not energized unless at least one reactor coolant pump is in operation, and if both reactor coolant pumps cease operation, then all control rods will be fully inserted and all CRDM's will be denergized as soon as possible.

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LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

FACILITY NAME (1) Point Beach Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 2 6 6 9 4 - 0 0 5 - 0 0 0 2 OF 0 3	LER NUMBER (6)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		

TEXT (If more space is required, use additional NRC Form 366A's) (17)

Because of the proposed use of optimized fuel assemblies (OFA) in future core fuel reloads, the Licensee contracted with Westinghouse Electric Corporation to perform a reload transition safety report (RTSR) for reanalysis of various accidents described in the Final Safety Analysis Report (FSAR) and for engineering evaluation of other specified conditions. After receipt of the RTSR, the engineering review noted that the new analysis for subcritical uncontrolled RCCA withdrawal accident included the operation of at least one reactor coolant pump in its basis.

It was identified that this new basis was more restrictive than the actual previous operation of both units' reactor coolant pumps allowed by Technical Specifications, which state that when the reactor is critical and above 1% of rated power except for natural circulation tests, at least one reactor coolant pump shall be in operation. Due to substantial natural circulation flow, it had been considered satisfactory to operate with both reactor coolant pumps secured while subcritical, even with control rod drive mechanisms energized. This most recently occurred during the Unit 1 post-refueling testing period where hot rod drop tests were performed at no-forced flow conditions on April 7, 1984. It should be noted that the FSAR makes no mention of the operation of reactor coolant pumps in the basis for the "uncontrolled RCCA withdrawal from a subcritical condition" accident analysis.

Due to the difference between the basis of reactor coolant pump operation, as delineated by the new subcritical uncontrolled RCCA withdrawal accident analysis, and previous plant operation, the Licensee questioned Westinghouse on the assumption of one reactor coolant pump in operation for the analysis and the fact that it is not required by Technical Specifications. Westinghouse responded in a report received on August 23, 1984, that the analysis for uncontrolled RCCA withdrawal from a subcritical condition assumes one pump in operation. The response further stated that this assumption has been consistently followed for all two-loop plant rod withdrawal from subcritical analyses, including that in the Point Beach FSAR. Westinghouse also indicated that using their standard analysis and modeling techniques, acceptable analysis results are not attainable with no pumps in operation. Without further work, Westinghouse could not determine whether an analysis using other modeling techniques for the condition of no reactor coolant pumps operating would attain acceptable results. Licensee has requested a proposal from the vendor to conduct an analysis of the subcritical rod withdrawal accident assuming no reactor coolant pumps running.

In further communication with Westinghouse on August 31, 1984, it was stated that the original FSAR analysis for the subcritical uncontrolled RCCA withdrawal accident had included the operation of one reactor coolant pump in its basis. Although the technical specification requires at least one reactor coolant pump to be in operation when critical and above 1% power (except for testing), a requirement for reactor coolant pump operation when subcritical with the control drive mechanisms energized had not been included at the time the specifications were drafted and approved.

LICENSEE EVENT REPORT (LER) TEXT CONTINUATION

APPROVED OMB NO. 3150-0104
EXPIRES 5/31/85

FACILITY NAME (1) Point Beach Unit 1	DOCKET NUMBER (2) 0 5 0 0 0 2 6 6 8 4	LER NUMBER (5)			PAGE (3)	
		YEAR	SEQUENTIAL NUMBER	REVISION NUMBER		
			0 0 5	0 0 0	3	OF

TEXT (If more space is required, use additional NRC Form 366A's) (17)

The Licensee has issued an administrative control procedure in the form of an Operations special order to ensure that the basis of the subcritical uncontrolled RCCA withdrawal accident as presently analyzed was addressed. The special order stated that a CRDM is not to be energized unless at least one reactor coolant pump is in operation, and if both reactor coolant pumps cease operating, then all control rods will be fully inserted and all CRDMs will be deenergized as soon as possible.

A change to plant Technical Specifications is being evaluated to satisfactorily address this issue. Since there have not been any continuous rod withdrawal accidents during past no-forced flow conditions, the health and safety of the public has not been compromised.

An ENS notification was made on August 31, 1984, as it was evaluated to meet the intent of 10 CRF 50.72. The Senior Resident Inspector is aware of this event.



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

October 1, 1984

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
LICENSEE EVENT REPORT NO. 84-005-00
SUBCRITICAL UNCONTROLLED RCCA WITHDRAWAL
ACCIDENT BASIS IDENTIFICATION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Enclosed is Licensee Event Report No. 84-005-00 which provides a description of past operation which was outside the basis of the subcritical uncontrolled rod cluster control assembly withdrawal accident analysis. This is considered reportable in accordance with 10 CFR 50.73(a)(2)(ii)(B), "Any event or condition...that resulted in the nuclear power plant being...in a condition that was outside the design basis of the plant."

Very truly yours,

Vice President-Nuclear Power

C. W. Fay

Enclosure

Copy to NRC Resident Inspector

~~61-20-104~~

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