



Point Beach Nuclear Plant
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NPL 98-0759

10 CFR 50.4
10 CFR 50.90
10 CFR 51.22

September 23, 1998

U.S. NUCLEAR REGULATORY COMMISSION

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Washington, DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATIONS CHANGE REQUEST 209
REMOVAL OF TESTING REQUIREMENTS
IN SNUBBER TECHNICAL SPECIFICATION 15.4.13
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 10 CFR 50.90, Wisconsin Electric Power Company (WE), licensee for the Point Beach Nuclear Plant (PBNP), proposes to amend Facility Operating Licenses DPR-24 and DPR-27 for PBNP Units 1 and 2, respectively. The requested amendment will eliminate the testing requirements of plant Technical Specification (TS) 15.4.13.

The purpose of the proposed amendment is to remove the explicit requirements of plant TS 15.4.13, "SHOCK SUPPRESSORS (SNUBBERS)," from the PBNP TS. This section defines test requirements for safety-related shock suppressors (snubbers) that are already included under the PBNP In-Service Inspection (ISI) Program in accordance with TS 15.4.2.B, "In-Service Inspection and Testing of Safety Class Components Other than Steam Generator Tubes." TS 15.4.2.B.3 states that "In-service testing of ASME Code Class 1, 2, and 3 pumps, valves, and snubbers shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a."

The PBNP ISI Program is currently testing to the requirements of the ASME Code, Section XI, 1986 Edition. The applicable snubber testing requirements contained in this edition are included in Articles IWF-1000, 2000, and 5000. The 1987 Edition of ASME Section XI endorses ASME/ANSI OM Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints." ASME/ANSI OM Part 4 (OM-4) provides more comprehensive detail and requirements on snubber testing than Articles IWF-1000, 2000 and 5000 of the 1986 Edition and meets or exceeds the requirements of the 1986 Edition of the Code. PBNP will implement a program based upon the OM-4 requirements after approval of this amendment request. OM-4 establishes comprehensive criteria for snubber inspection and testing to ensure an appropriate level of reliability and detection of abnormal conditions and meets or exceeds the IWF-1000, 2000 and 5000 requirements of the 1986 ASME Code, to which WE must adhere.

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The proposed change is requested because TS 15.4.13 requirements are redundant to this industry standard and the requirements of TS section 15.4.2.B. This consolidation of testing requirements will simplify the snubber testing program and will align PBNP to nuclear industry standards.

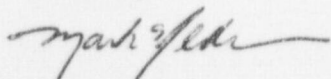
Elimination of the snubber testing requirements in TS 15.4.13 of the PBNP Technical Specifications is also consistent with NUREG 1431, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." Snubber testing requirements are not included in the Standard Technical Specifications (STS), because having snubber testing requirements in the STS would be duplicative of the requirements of 10 CFR 50.55a, which requires ISI testing to be performed in accordance with ASME Section XI and the applicable addenda.

Included in Attachment 1 to this letter are: (1) Description of proposed change and supporting information; (2) A safety evaluation of the proposed change; and (3) A no significant hazards determination. Attachment 2 to this letter contains the marked-up Technical Specifications indicating the proposed changes. Attachment 3 to this letter is a comparison of the relevant testing requirements contained in the ASME Code and TS 15.4.13.

It has been determined that the proposed changes meet the categorical exclusion criteria of 10 CFR 51.22(c)(9) in that they: (1) Involve no significant hazards consideration; (2) Do not result in a significant change in the types or significant increase in the amounts of any effluents released off-site; and (3) Do not result in a significant increase in individual or cumulative radiation exposure. Therefore, in accordance with 10 CFR 51.22(b), an environmental assessment or impact statement need not be prepared.

WE requests approval of this amendment prior to May 1, 1999, to facilitate the timely scheduling and implementation of the OM-4 snubber testing requirements prior to the next Unit 1 refueling outage (currently scheduled for October 1999). Should you have any questions on this submittal or require additional information, please contact us.

Sincerely,



Mark E. Reddemann
Site Vice President
Point Beach Nuclear Plant

MAW/dms

Attachments

cc: NRC Regional Administrator
NRR Point Beach Project Manager

Subscribed to and sworn before me
this 23rd day of September, 1998

Mary B. Koudelka Mary S. Koudelka
Notary Public, State of Wisconsin
My commission expires 11/11/01.

NRC Resident Inspector
PSCW

Description of Proposed Changes and Supporting Information:

Wisconsin Electric Power Company (WE), licensee for the Point Beach Nuclear Plant (PBNP), proposes to amend Facility Operating Licenses DPR-24 and DPR-27 for PBNP Units 1 and 2, respectively. The requested amendment will eliminate the testing requirements of plant Technical Specification (TS) 15.4.13.

The purpose of the proposed amendment is to remove the explicit requirements of plant TS 15.4.13, "SHOCK SUPPRESSORS (SNUBBERS)," from the PBNP TS. This section defines test requirements for safety-related shock suppressors (snubbers) which are already included under the PBNP In-Service Inspection (ISI) Program in accordance with TS 15.4.2.B, "In-Service Inspection and Testing of Safety Class Components Other than Steam Generator Tubes." TS 15.4.2.B.3 states that "Inservice testing of ASME Code Class 1, 2, and 3 pumps, valves, and snubbers shall be performed in accordance with Section XI of the ASME Boiler and Pressure Vessel Code and applicable Addenda as required by 10 CFR 50.55a."

The PBNP ISI Program is currently testing to the requirements of the 1986 Edition of the ASME Section XI Code. The applicable snubber testing requirements contained in this edition are included in Articles IWF-1000, 2000, and 5000. The 1987 edition of ASME Section XI endorses ASME/ANSI OM Part 4, "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints." ASME/ANSI OM Part 4 (OM-4) provides more comprehensive detail and requirements on snubber testing than Articles IWF-1000, 2000 and 5000 of the 1986 Edition and meets or exceeds the 1986 Code requirements. PBNP will implement the OM-4 requirements after approval of this amendment request. OM-4 establishes comprehensive criteria for snubber inspection and testing to ensure an appropriate level of reliability and detection of abnormal conditions and meets or exceeds the applicable IWF requirements to which WE must adhere.

The proposed change is being requested because TS 15.4.13 requirements are redundant to this industry standard and the requirements of TS section 15.4.2.B. This consolidation of testing requirements will simplify the snubber testing program and will align PBNP to nuclear industry standards.

Elimination of the snubber testing requirements in TS 15.4.13 of the PBNP Technical Specifications is consistent with NUREG 1431, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." Snubber testing requirements are not included in the Standard Technical Specifications (STS), because having snubber testing requirements in the STS would be duplicative of the requirements of 10 CFR 50.55a, which requires ISI testing to be performed in accordance ASME Section XI and the applicable addenda.

Shock suppressors or dynamic restraints (snubbers) prevent unrestrained pipe motion under dynamic loads. The restraining action of the snubbers ensures that the initiating event failure does not propagate to other parts of the failed system or to other safety systems.

ASME Section XI establishes general requirements for periodic examination and testing of nuclear power plant equipment dynamic restraints (snubbers) from preservice inspection through the life of the plant. Considerable emphasis is placed on the accumulation of equipment dynamic restraint performance data by examination or testing throughout the operational life of the device. The evaluation of this data is intended to provide a statistical basis for determining performance of equipment dynamic restraints in service and will allow for the reevaluation of the test frequency requirements established by this standard.

Attachment 3 to this letter is a comparison of the relevant testing requirements contained in ASME/ANSI OM-4, 1987 Edition, TS 15.4.13 and the 1986 Edition of the ASME Code. As evidenced in Attachment 3, the snubber testing requirements included in ASME/ANSI OM-4, 1987 Edition are more comprehensive and in general more conservative than the snubber testing requirements contained in TS 15.4.13 and meet or exceed the 1986 Code requirements. OM-4 relaxations are included in the Attachment 3 table under Items 6, 9, and 14; however appropriate justification for these relaxations is provided in the respective comparison analysis for each item. Therefore, PBNP is requesting that TS section 15.4.13 be removed from the Technical Specifications. ASME OM-4 requirements define a conservative program for snubber testing which ensures the snubbers will perform their safety-related function.

Safety Evaluation of Proposed Change:

The proposed change is intended to remove the redundant snubber testing requirements contained in TS 15.4.13. This section defines redundant test requirements for safety-related snubbers which are already included under the PBNP In-Service Inspection (ISI) Program in accordance with TS 15.4.2.B.3.

As noted above, elimination of the snubber testing requirements in TS 15.4.13 of the PBNP Technical Specifications is consistent with NUREG 1431, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." Snubber testing requirements are not included in the Standard Technical Specifications (STS), because having snubber testing requirements in the STS would be duplicative of the requirements of 10 CFR 50.55a, which requires ISI testing to be performed in with accordance ASME Section XI and the applicable addenda.

In addition, as evidenced in the comparison analysis between the relevant OM-4 test requirements, the TS 15.4.13 test requirements, and the 1986 ASME Code requirements

(Attachment 3) the snubber testing requirements included in OM-4 are more comprehensive and in general more conservative than the snubber testing requirements contained in TS 15.4.13 and meet or exceed the requirements of the 1986 Code. OM-4 relaxations are included in the attachment 3 table under Items 6, 9, and 14; however appropriate justification for these relaxations is provided in the respective comparison analysis for each item. Therefore, the snubber test program as defined by the ASME Code and required by the TS and regulation provides the requisite level of assurance that the snubbers will perform their safety-related function.

Conclusion:

Based on the above, WE believes that removing the explicit testing requirements of TS 15.4.13 has no adverse effect on nuclear safety. Testing in accordance with code requirements as stipulated by 10 CFR 50.55a and required by TS 15.4.2.B.3 provides the requisite level of safety.

No Significant Hazards Determination of Proposed Change:

Wisconsin Electric Power Company, licensee for the PBNP, has evaluated the proposed amendment in accordance with the requirement of 10 CFR 50.91(a)(1), against the standards in 10 CFR 50.92, and has determined that the operation of the PBNP in accordance with the proposed amendment involves no significant hazards consideration. The evaluation against each of the standards in 10 CFR 50.92 follows:

1. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not result in a significant increase in the probability or consequences of an accident previously evaluated.

These changes do not involve a significant increase in the probability of an accident previously evaluated because no such accidents are affected by the proposed revisions to delete TS 15.4.13. The proposed TS change does not introduce any new accident initiators.

Initiating conditions and assumptions are unchanged and remain as previously analyzed for accidents in the PBNP Final Safety Analysis Report. The proposed TS change does not involve any physical changes to systems or components, nor does it alter the typical manner in which the systems or components are operated. Therefore, these changes do not increase the probability of previously evaluated accidents.

As noted above, the snubber testing requirements included in the ASME/ANSI OM-4 Code are more comprehensive and in general more conservative than the snubber testing requirements currently contained in TS 15.4.13.

These changes do not involve a significant increase in the consequences of an accident or event previously evaluated because the source term, containment isolation or radiological releases are not being changed by these proposed revisions. The snubber program ensures that snubbers function as required, therefore related systems continue to function as designed and analyzed. Existing system and component redundancy and operation is not being changed by these proposed changes. The assumptions used in evaluating the radiological consequences in the PBNP Final Safety Analysis Report are not invalidated. Therefore, these changes do not affect the consequences of previously evaluated accidents.

2. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated.

These changes do not introduce nor increase the number of failure mechanisms of a new or different type than those previously evaluated since there are no physical changes being made to the facility. As noted above, the snubber testing requirements included in the ASME code in general are more comprehensive than the snubber testing requirements currently contained in TS 15.4.13 and provide for the requisite level of assurance of snubber operability. The design and design basis of the facility remain unchanged. The plant safety analyses remain unchanged. Therefore, the possibility of a new or different kind of accident from any accident previously evaluated is not introduced.

3. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments does not involve a significant reduction in a margin of safety.

The proposed changes do not involve a significant reduction in the margin of safety because existing component redundancy is not being changed by these proposed changes. There are no changes to the initial conditions contributing to accident severity or consequences, and safety margins established through the design and facility license including the Technical Specifications remain unchanged. Therefore, there are no significant reductions in a margin of safety introduced by this proposed amendment.

Environmental Assessment of Proposed Change:

An environmental assessment is not required for the changes proposed by this amendment request because the requested changes conform to the criteria for "actions eligible for categorical exclusion," as specified in 10 CFR 51.22(c)(9). The requested changes will have no impact on the environment and do not involve a significant hazards consideration as discussed in the preceding section. The requested changes do not involve a significant change in the types or significant increase in the amounts of any effluents that may be released offsite, and do not involve a significant increase in individual or cumulative occupational radiation exposure.