Wisconsin Electric
POWER COMPANY

Point Beach Nuclear Plant
6610 Nuclear Rd., Two Rivers, WI 54241

(920) 755-2321

NPL 98-0768

10 CFR 50.4
10 CFR 50.90
10 CFR 51.22

September 28, 1998

Document Control Desk
U. S. NUCLEAR REGULATORY COMMISSION
Mail Stop P1-137
Washington, DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST NUMBER 208
AMENDMENT TO FACILITY OPERATING LICENSES TO CLARIFY AND ADD A NOTATION DEFINITION CONTAINED IN TECHNICAL SPECIFICATION TABLE 15.4.1-1, "MINIMUM FREQUENCIES FOR CHECKS, CALIBRATIONS, AND TESTS OF INSTRUMENT CHANNELS"
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 amendments will incorporate a clarification to the plant Technical Specifications (TS).

The purpose of the proposed amendment is to clarify the notation definition of "R" in TS Table 15.4.1-1 "Minimum Frequencies for Checks, Calibrations, and Tests of Instrument Channels" and to add a new frequency "A." The proposed change would involve a revision to a notation, "R," used in various columns in TS Table 15.4.1-1 to specify a required surveillance frequency. The notation "R" is currently defined as a frequency of "Each refueling interval (but not to exceed 18 months)." The proposed change would redefine "R" as a frequency of "Each refueling interval (18 months)," consistent with NUREG 1431, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." In addition, a new notation "A" is proposed to be used to designate an annual 12-month frequency and would be defined as "Annually (12 months)" for instrumentation surveillance frequencies remaining on an annual frequency.

The proposed changes are necessary to clarify that the provisions of TS 15.4.0.2 (which allows 25% extension of surveillance frequencies) apply to these frequency requirements. The proposed definition change would be consistent with NUREG 1431, which allows the provisions of Standard Technical Specifications (STS) section 4.0.2 (25% extension of surveillance frequencies) to apply in this case.

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This change is necessary because the PBNP Unit 1 operating cycle (cycle 25) is currently scheduled for 15 months, which would allow Unit 1 to operate until October of 1999 (Unit 1 returned to service in July, 1998 after U1R24). Because the TS Table 15.4.1-1 required surveillances for Unit 1 were performed in February of 1998 (at the beginning of U1R24), without application of the 25% extension interval, the TS required surveillances would fall due in August of 1999. WE would like to avoid an unnecessary plant shutdown in August of 1999 (peak summer month) to perform the currently required surveillances. In addition, WE is currently planning to implement 18-month cycles for both PBNP units, and would like the proposed change approved to clarify that the refueling interval is 18 months and that the provisions of TS 15.4.0.2 apply to the frequencies specified in Table 15.4.1-1.

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. Included in Attachment 2 to this letter are the marked-up Technical Specifications indicating the proposed changes.

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 June 1, 1999 to facilitate timely implementation and avoid an unnecessary plant shutdown to perform the currently required surveillances. 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
NRC Resident Inspector
PSCW

Subscribed to and sworn before me
on this 28th day of September, 1998

Notary Public, State of Wisconsin

My Commission expires on September 16, 2001.

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 amendments will incorporate a clarification to the plant Technical Specifications (TS).

The proposed amendment would clarify the notation definition of "R" in TS Table 15.4.1-1 "Minimum Frequencies for Checks, Calibrations, and Tests of Instrument Channels" and add a new frequency "A." The change would involve a revision to a notation, "R," used in various columns in TS Table 15.4.1-1 to specify a required surveillance frequency. The notation "R" is currently defined as a frequency of "Each refueling interval (but not to exceed 18 months)." The proposed change would redefine "R" as a frequency of "Each refueling interval (18 months)," consistent with NUREG 1431, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." In addition, a new notation "A" is proposed to be used to designate an annual 12-month frequency and would be defined as "Annually (12 months)" for instrumentation surveillance frequencies remaining on an annual frequency. This new frequency, "A" would replace the current calibration frequency of "R" for the following TS Table 15.4.1-1 item numbers: Item 43, Volume Control Tank Level; and Item 29, Emergency Plan Radiation Survey Instruments. WE has determined that these items should remain on an annual calibration frequency.

The proposed changes are necessary to clarify that the provisions of TS 15.4.0.2 (which allows 25% extension of surveillance frequencies) apply to these frequency requirements. The proposed definition change would be consistent with NUREG 1431, which allows the provisions of Standard Technical Specifications (STS) Section 4.0.2 (25% extension of surveillance frequencies) to apply in this case.

A previous amendment to the PBNP TS (Amendment 76 and 80 to DPR-24 and DPR-27, respectively) changed the definition of "R" in Table 15.4.1-1 from "each refueling shutdown (but not to exceed 20 months)" to its present definition of "each refueling interval (but not to exceed 18 months)." This amendment was requested by PBNP to allow surveillance testing to be performed during other than refueling shutdown conditions. It was stated in this amendment request, and concurred by the NRC in the subsequent safety evaluation approving the amendment, that the revised definition was consistent with the language contained in NUREG 0452, "Standard Technical Specifications for Westinghouse Pressurized Water Reactors." NUREG 0452 also allowed the provisions of Standard Technical Specifications (STS) Section 4.0.2 (25% extension of surveillance frequencies) to apply in this case. Therefore, application of the 25% extension of surveillance frequencies would be consistent with PBNP's original intent to be consistent with the STS.

It should be noted that PBNP recognizes that the intent of the allowed 25% extension of surveillance frequencies is to provide flexibility in planning and scheduling and is not intended to be used as an operational convenience to routinely extend the surveillance interval.

This change is necessary because the PBNP Unit 1 operating cycle (cycle 25) is currently scheduled for 15 months, which would allow Unit 1 to operate until October of 1999 (Unit 1 returned to service in July after U1R24). Because the TS Table 15.4.1-1 required surveillances for Unit 1 were performed in February of 1998, without application of the 25% extension interval, the TS required surveillances would fall due in August of 1999. WE would like to avoid an unnecessary plant shutdown in August of 1999 (peak summer month) to perform the currently required surveillances. In addition, WE is currently planning to implement 18-month cycles for both PBNP units, and would like the proposed change approved to clarify that the refueling interval is 18 months and that the provisions of TS 15.4.0.2 apply to the frequencies specified in Table 15.4.1-1.

Technical Justification:

To ensure that the application of the 25% surveillance interval extension would not have an adverse effect on the instrumentation in Table 15.4.1-1, the NRC guidance contained in NRC Generic Letter 91-04, "Changes in Technical Specification Surveillance Intervals to Accommodate a 24-Month Fuel Cycle," dated April 2, 1991, (GL 91-04) was consulted in the preparation of this amendment. Although GL 91-04 is not specifically applicable to this change request (GL 91-04 was intended to provide guidance to plants going to a 24-month refueling cycle, which would extend the surveillance frequencies to 30 months with incorporation of the 25% extension), some guidance contained in Enclosure 2 of GL 91-04 was used in preparing this amendment.

Instrument drift studies were performed for calibration of instruments contained in TS Table 15.4.1-1 that perform safety functions (i.e., safety related) including providing the capability for safe shutdown. The purpose of these studies was to ensure appropriate safety limits and functions would be met if the 25% extension of surveillance interval (18 months plus the TS 15.4.0.2 allowable 25% = 22.5 months) was applied to the instrumentation contained in TS Table 15.4.1-1. The drift studies and corresponding calculations determined that the magnitude of the instrument drift (for instrumentation affected by drift) that could occur over a 22.5-month interval was bounded by the uncertainty allowances used in determining safety system setpoints.

In addition, calibration data from surveillance records were reviewed for the instrumentation contained in TS Table 15.4.1-1. The purpose of this review was to determine the impact that an increase of 25% (i.e., 22.5 months) in the surveillance frequency would have on instrument availability. This review identified that as-found and as-left data has not exceeded acceptable limits for the calibration intervals except on rare occasions. Because of the very small percentage of failures which are detected on the current surveillance intervals and because of system redundancy, PBNP has concluded that the change in the surveillance frequency will have a small impact, if any, on system availability, with the exception of those items noted below.

The new notation "A" proposed to be used to designate an annual 12-month frequency was necessary because the review discussed above (surveillance record review) identified that

instrumentation included in TS Table 15.4.1-1 Item 43 (Volume Control Tank Level) and Item 29 (Emergency Plan Radiation Survey Instruments) would not support a possible surveillance interval up to 22.5 months. As a result, WE has conservatively determined that these items should remain on their current annual calibration frequency, and has introduced the new notation "A" to incorporate this requirement. PBNP has historically operated on a nominal 12-month cycle. Therefore, this frequency is consistent with past operations.

Finally, a program to monitor instrumentation and control preventative maintenance, corrective maintenance, and surveillance test histories is in place at PBNP (NP 8.3.5 "Machinery History - Instrumentation and Control"). The program currently requires a semi-annual and annual review of instrumentation and control histories important to safety. The intent of this program is for Engineering to identify any adverse trends in I&C machinery performance, and ensure the appropriate corrective actions are implemented.

Safety Evaluation of Proposed Change:

The proposed change to notation "R" is intended to clarify that the refueling interval is 18 months and that the provisions of TS 15.4.0.2 (which allows 25% extension of surveillance frequencies) can be applied, and is consistent with the wording and allowances contained in the Standard Technical Specifications (NUREG 0452 and NUREG 1431). The proposed change to add a new notation of "A" is administrative only and is being added to be used on instrumentation surveillance frequencies remaining on an annual frequency. The proposed changes are to the surveillance frequencies only, and do not involve a change to the TS surveillance requirements themselves or the way in which the surveillances are performed.

As noted above, instrument drift studies were performed for calibration of instruments contained in TS Table 15.4.1-1 that perform safety functions (i.e. safety related) including providing the capability for safe shutdown. The purpose of these studies was to ensure appropriate safety limits and functions would be met if the 25% extension of surveillance interval (18 months plus the TS 15.4.0.2 allowable 25% = 22.5 months) was applied to the instrumentation contained in TS Table 15.4.1-1. The drift studies and corresponding calculations determined that the magnitude of the instrument drift (for instrumentation affected by drift) that could occur over a 22.5-month interval was bounded by the uncertainty allowances used in determining safety system setpoints.

Calibration data from surveillance records were reviewed for the instrumentation contained in TS Table 15.4.1-1. The purpose of this review was to determine the impact that an increase of 25% in the surveillance frequency would have on instrument availability. This review identified that as-found and as-left data has not exceeded acceptable limits for the calibration intervals except on rare occasions. Because of the very small percentage of failures which are detected on the current surveillance intervals and because of system redundancy, PBNP has concluded that the change in the surveillance frequency will have a small impact, if any, on system availability.

In addition, a program to monitor instrumentation and control preventative maintenance, corrective maintenance, and surveillance test histories is in place at PBNP (NP 8.3.5 "Machinery History - Instrumentation and Control"). The program currently requires a semi-annual and annual review of instrumentation and control histories important to safety. The intent of this program is for Engineering to identify any adverse trends in I&C machinery performance, and ensure the appropriate corrective actions are implemented.

Finally, the use of the allowance to extend surveillance intervals by 25% can also result in a significant safety benefit for surveillances that are performed on a routine basis during plant operation. This safety benefit is incurred when a surveillance interval is extended at a time that conditions are not suitable for performing the surveillance. Examples of this include transient plant operating conditions or conditions in which safety systems are out of service because of ongoing surveillance or maintenance activities. In such cases, the safety benefit of allowing the use of the 25% allowance to extend a surveillance interval would outweigh any benefit derived by limiting the intervals to the presently interpretable 18 months. The limitation of specification 15.4.0.2 is based on engineering judgment and the recognition that the most probable result of any surveillance being performed is the verification of conformance with the surveillance requirements. This provision is sufficient to ensure that the reliability ensured through surveillance activities is not significantly degraded beyond that obtained from the specified surveillance interval.

Based on the above, WE has concluded that clarifying TS Table 15.4.1-1 notation "R," allowing the 25% extension of surveillance frequencies to apply to notation "R," and adding a new notation "A" has no adverse effect on nuclear safety.

No Significant Hazards Determination of Proposed Change:

Wisconsin Electric Power Company, licensee for the PBNP, has evaluated the proposed amendments 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 clarify that the provisions of TS 15.4.0.2 apply to notation "R" in TS Table 15.4.1-1. The proposed TS changes do not introduce any new accident initiators since no accidents previously evaluated have as their initiators anything related to the change in the frequency of surveillance testing.

The increased time potential between surveillance frequencies does not significantly increase the probability or failure of the instrumentation contained in TS Table 15.4.1-1. As noted above, instrument drift studies concluded that the magnitude of the instrument drift (for instrumentation affected by drift) that could occur over a 22.5-month interval was bounded by the uncertainty allowances used in determining safety system setpoints, and the review of historical calibration data concluded that the as-found and as-left data has not exceeded acceptable limits for the calibration intervals reviewed, except on rare occasions.

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

These changes do not involve a significant increase in the consequences of an accident previously evaluated because the source term, containment isolation or radiological releases are not being changed by these proposed revisions. 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. The surveillance test requirements and the way they are performed will remain unchanged. 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 new or significant 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 change 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.

Attachment 2 to NPL 98-0768
Marked up Technical Specification Changes for TSCR 208

This attachment consists of a marked up Technical Specification Table 15.4.1-1 indicating the changes requested by this TSCR. This attachment contains four (4) pages (including this page).