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VPNPD-88-286
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10 CFR 50.90

May 24, 1988

CERTIFIED MAIL

U. S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 123
REACTOR COOLANT TEMPERATURE, NUCLEAR POWER RANGE
AND CONTAINMENT PRESSURE CHANNEL SURVEILLANCE TESTING
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.59 and 50.90, Wisconsin Electric Power Company hereby submits an application for amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. These amendments would include changes to Technical Specification Table 15.4.1-1, "Minimum Frequencies for Checks, Calibrations, and Test of Instrument Channels." These proposed changes would change the frequency for testing the nuclear power range, reactor coolant temperature, and reactor containment pressure channels from biweekly to monthly. We have attached the Technical Specification pages containing the proposed revisions and identified the changes with margin bars.

Table 15.4.1-1, Item 1, "Nuclear Power Range", currently requires that the nuclear power range instrument channels be tested biweekly. We propose that this requirement be changed to a monthly test. This will reduce the chances of a spurious reactor trip during testing and will also reduce the manpower requirements for this testing. All nuclear instrument channels, including power range, use essentially the same bistables and relays. However, we have been unable to identify any reason why power range testing is biweekly and the other nuclear instrument channel testing is monthly. We have also checked with other licensees who have similar nuclear power range instrumentation and determined that they have a monthly test requirement. Additionally, monthly surveillance testing is consistent with the Standard Technical Specifications for Westinghouse Pressurized Water Reactors.

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Table 15.4.1-1, Item 4, "Reactor Coolant Temperature", is the only other reactor protection instrumentation which is required to be tested other than monthly. Biweekly testing of the temperature channels results in biweekly cycling of reactor trip breakers. According to WCAP-11312, "WOG Technical Specification Subcommittee Reactor Trip Breaker Maintenance/Surveillance Optimization Program", dated April 1987, frequent testing of reactor trip breakers may be counter-productive. WCAP-11312 recommends that reactor trip breaker testing be conducted less frequently.

The reactor coolant temperature channels use essentially the same bistables and components as other reactor protection channels requiring monthly testing. Again, we know of no reason for conducting this testing more frequently than monthly. Changing the reactor coolant temperature surveillance test to monthly will reduce the likelihood of a spurious reactor trip during testing; it will reduce unnecessary reactor trip breaker cycling and will make the test consistent with other similar channels. A monthly testing frequency is also consistent with the Standard Technical Specifications for Westinghouse Pressurized Water Reactors.

Table 15.4.1-1, Item 18, "Reactor Containment Pressure", is the only other instrument channel requiring biweekly testing. This test verifies that the containment pressure logic (high-high pressure) for steam line isolation is functioning properly. Once again, these containment pressure channels use essentially the same components as other instrument channels which require monthly surveillance testing including the other containment pressure channels covered under Item 24 of Table 15.4.1-1. As with the nuclear power range and reactor coolant temperature channels, although the biweekly testing requirement has existed since plant start-up, we have identified no basis for the difference in testing frequency. We have also checked with other licensees having similar instrumentation and, again, the biweekly testing is unique to Point Beach. Additionally, monthly testing is consistent with the Standard Technical Specifications for Westinghouse Pressurized Water Reactors.

As required by 10 CFR 50.91(a), we have evaluated these changes in accordance with the standards specified in 10 CFR 50.92 to determine if the proposed changes constitute a significant hazards consideration. As stated in 10 CFR 50.92, a proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not (1) involve a significant increase in the probability or consequences of an accident previously evaluated, (2) create the possibility of a new or different kind of accident from any accident previously evaluated, or (3) involve a significant reduction in a margin of safety.

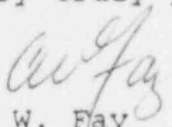
The proposed changes would reduce the frequency of testing the channel logics from biweekly to monthly. These changes will make the nuclear power range, reactor coolant temperature, and containment pressure channel logic test frequencies consistent with the other channels which use similar components. Additionally, these changes will allow Point Beach Nuclear Plant, Units 1 and 2, to conform to industry standards as well as the Standard Technical Specifications for Westinghouse Pressurized Water Reactors. These channels have been very reliable. Based on the most severe drift rate experienced during biweekly testing, the channels should remain within Technical Specification setpoint limits between monthly testing. We, therefore, believe that these changes will not involve a significant increase in the probability or consequences of an accident previously evaluated, and the first criterion is not violated.

Because these changes only modify the frequency of testing for these three instrument channels and introduce no new testing, a new or different accident from any previously evaluated accident cannot be created and, therefore, the second criterion is not violated.

Lastly, these changes do not involve a significant reduction in a margin of safety for the same reasons discussed for criterion one. The amended test frequencies will be consistent with (1) other plant instrumentation using the same relays and bistables, (2) industry testing frequencies, and (3) the Standard Technical Specifications.

We have enclosed a check in the amount of \$150 for the application fee prescribed in 10 CFR 170. Please do not hesitate to contact us if you have any questions concerning this request.

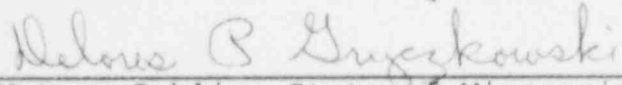
Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Enclosures (Check 625753)

Copies to NRC Regional Administrator, Region III
NRC Resident Inspector
R. S. Cullen, PSCW

Subscribed and sworn to before me
this 24th of May 1988.


Delores B. Gyzekowski
Notary Public, State of Wisconsin

My Commission expires 5/27/90.