Wisconsin Electric POWER COMPANY
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NRC-86-57

July 1, 1986

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. George Lear, Director
PWR Project Directorate 1

Gentlemen:

DOCKETS 50-266 AND 50-301
GENERIC COMPLIANCE WITH TMI ACTION ITEM II.K.3.31
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with a letter from Edward J. Butcher, NRC, to C. W. Fay, Wisconsin Electric, dated June 26, 1985, Wisconsin Electric Power Company is required to submit a plant specific Small Break Loss of Coolant Accident (SBLOCA) analysis to the NRC by July 1, 1986. The analysis is to satisfy the requirements of TMI Action Plan Item II.K.3.31. This letter satisfies the requirements by referencing generic studies submitted to the NRC by the Westinghouse Owners Group (WOG).

On June 11, 1986, L. D. Butterfield of the Westinghouse Owners Group sent Letter OG-190 to J. Lyons of the U. S. Nuclear Regulatory Commission. The letter transmitted copies of the Westinghouse Topical Report WCAP-11145 entitled, "Westinghouse Small Break LOCA ECCS Evaluation Model Generic Study with the NOTRUMP Code." The report addresses the requirements of NUREG-0737 II.K.3.31 on a generic basis in accordance with NRC Generic Letter 83-35 from D. G. Eisenhut, "Clarification of TMI Action Plan Item II.K.3.31", November 2, 1983. Generic analyses demonstrate that results of previously NRC-approved SBLOCA calculations using WFLASH are conservative when compared to the results of the new SBLOCA calculations using NOTRUMP.

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Topical Report WCAP-11145 documents the results of a series of SBLOCA analyses performed with the NRC-approved NOTRUMP SBLOCA Evaluation Model (EM). Cold leg break spectrum analyses were performed for the limiting SBLOCA plant from each of the Westinghouse four-loop, four-loop Upper Head Injection (UHI), three-loop, and two-loop plant categories. The limiting SBLOCA plant in each category was defined on the basis of previous SBLOCA analyses which were performed with the NRC-approved WFLASH SBLOCA EM. In addition to the cold leg break spectrums, a hot leg break and a pump suction break were performed as part of the four-loop plant analyses, confirming that the cold leg was still the worst break location. Comparison of the NOTRUMP cold leg break spectrum results with the previously generated WFLASH results showed that the WFLASH results were conservative for all plant categories. In particular, the two-loop plant category results showed that the NOTRUMP computer program calculated a peak cladding temperature (PCT) 917 degrees F lower than the 1713 degree F PCT calculated by the WFLASH computer program for the most limiting plant in the two-loop plant category.

The generic results documented in WCAP-11145 demonstrate that a plant specific reanalysis of the two-loop Point Beach Nuclear Plant with the NOTRUMP SBLOCA EM would result in the calculation of a PCT which would be significantly lower than the 992 degree F PCT calculated for a SBLOCA at Point Beach Nuclear Plant using the WFLASH computer program. Hence, the WFLASH SBLOCA EM results which currently form the licensing basis for Point Beach Nuclear Plant are conservative and are still valid for demonstrating the adequacy of the Emergency Core Cooling System to mitigate the consequences of a SBLOCA, as required by 10CFR50.46. A plant specific analysis is not needed in order for Point Beach Nuclear Plant to comply with TMI Action Item II.K.3.31. Rather, Wisconsin Electric Power Company references WCAP-11145 to comply with TMI Action Item II.K.3.31 on a generic basis.

If you have any questions regarding this response, please contact us and we will attempt to answer your concerns.

Very truly yours,

C. W. Fay
Vice President
Nuclear Power

Copy to Resident Inspector