



Wisconsin Electric POWER COMPANY
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VPNPD-86-203
NRC-86-38

May 6, 1986

CERTIFIED MAIL

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

Attention: Mr. G. Lear, Project Director
PWR Project Directorate No. 1

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 110
COMPONENT COOLING WATER HEAT EXCHANGER
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with 10 CFR 50.59(c), Wisconsin Electric Power Company (Licensee) hereby requests an amendment to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2, respectively. The purpose of this amendment is to provide a temporary change to the Point Beach Units 1 and 2 Technical Specification 15.3.4.C, Limiting Condition for Operation (LCO), of the component cooling water (CCW) system to permit installation of an additional CCW heat exchanger. The details of this installation, together with the proposed technical specification revision, are provided below.

Wisconsin Electric is presently involved in a program to upgrade the CCW system. This program includes replacement of the three existing CCW heat exchangers and addition of a fourth heat exchanger. The installation of a new fourth CCW heat exchanger will improve both the system's reliability and availability. With the addition of this heat exchanger, the plant design will provide two "swing" heat exchangers which can be aligned to service either unit. Also, the addition of the fourth CCW heat exchanger will allow us to perform maintenance on any individual CCW heat exchanger without the constraint of a 48-hour Technical Specification LCO. Although we believe that replacement of the three existing CCW heat exchangers can be done within the limits

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of the existing Technical Specification, the addition of the fourth unit cannot be accomplished within the 48-hour LCO restriction.

Installation of the new CCW heat exchangers will begin at the end of June 1986, with both units expected to be operating at power. The fourth CCW heat exchanger will be positioned between the existing heat exchangers "A" AND "B". In order to "tie in" the fourth heat exchanger, the existing CCW heat exchangers will have to be isolated to allow the associated piping to be modified. Once the heat exchanger is isolated, piping spool segments which "tie in" this heat exchanger will be cut and removed to allow the installation of new piping spools for the new fourth heat exchanger. The heat exchanger will be rendered out of service upon the cutting of its associated piping. Currently, Specification 15.3.3.C.2.b allows one heat exchanger to be out of service for no more than 48 hours with both units operating. This amount of time is insufficient to accomplish the construction required to return the system with the new fourth heat exchanger in place to a normal line-up. We anticipate that a maximum of five (5) days out of service time for any one heat exchanger would be sufficient to complete this construction as detailed below:

1. Cut and remove existing piping spools - One day
2. Weld-prep and align new piping spools - One day
3. Weld new piping spools - One day
4. Install miscellaneous instrumentation - One day
5. Hydro test newly installed piping - One day

We are, therefore, requesting that a waiver to Specification 15.3.3.C.2.b be granted for the period of July through September 1986 to permit the above installation. It is suggested that this waiver be documented by including the following new footnote to Specification 15.3.3.C.2.b:

"During the installation of an additional component cooling heat exchanger, one of the component cooling heat exchangers may be out of service for up to five (5) days. This installation will take place during the period from July to September 1986."

At no time during this period would any one CCW heat exchanger be removed from service for longer than five days at one time. It is anticipated that the piping installations for only the "B" or swing heat exchanger will necessitate using the five-day out-of-service period permitted by this proposed specification change. During the piping modifications for the tie-ins to the

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"A" and "C" heat exchangers, however, each of these heat exchangers may be removed from service for a period of more than forty-eight hours but less than the five days permitted by the footnote. We emphasize that at no time would more than one CCW heat exchanger be out of service, and no CCW heat exchanger would be removed from service before the other heat exchangers are verified to be fully operable.

We are planning to conduct these modifications to the Point Beach CCW system while both units are operating at power rather than during a refueling or cold-shutdown outage. During power operations the heat load on the CCW system is considerably less than operation with one unit in cold shutdown and the residual heat removal (RHR) system in operation to removal decay heat from the shutdown unit. Should a failure occur in the in-service CCW heat exchanger while the standby heat exchangers were removed from service for the discussed modifications, the affected unit would be put in hot shutdown with residual heat being removed through the steam generators. If a similar failure occurred on a shutdown unit, the heat sink for the RHR system would be disabled, and the shutdown unit would warm up to the point at which cooling could take place by means of the steam generators.

We have examined this license amendment application and Technical Specification change request with respect to the criteria of 10 CFR 50.92 and have determined that this amendment will not result in a significant hazards consideration. This change consists of a temporary extension of an out-of-service condition already permitted by the existing Technical Specifications. Accordingly, this action in no way creates the possibility of a new or different kind of accident from any accident previously evaluated, nor does it involve a reduction in the margin of safety already provided by the system. The CCW system for both units will remain in service at all times. It is only the capability to utilize the swing heat exchanger which will be temporarily unavailable. This condition is already permitted by the limiting conditions for operation. This change will extend this time period from a maximum of forty-eight hours, or two days, to five days.

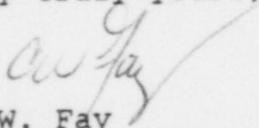
The third criteria of 10 CFR 50.92 concerns the potential that the change involves a significant increase in the probability or consequences of an accident previously analyzed. Removing a standby component from service cannot increase the probability for an accident. This probability remains a function of the collective failure frequencies of the system components and cannot be influenced by the probability of availability of a standby component. This premise is recognized in the existing limiting condition for operation in several specifications which

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permit standby components to be removed from service temporarily for inspection or maintenance. The consequences of an accident could potentially be influenced by the amount of time a standby component is permitted to be out of service. In this situation a failure of the in-service CCW heat exchanger at the same time the standby heat exchanger is removed from service precludes the ability to switch to the standby heat exchanger. This means that the affected unit would have to be shut down and placed in hot standby. Continued availability of the CCW system for that unit would not be needed since decay heat could be removed by means of the steam generators. There would, therefore, be no increase in potential off-site or on-site radiological consequences, and the conclusion may be made that the proposed change does not involve a significant hazards consideration.

In accordance with the Commission's regulations, we are enclosing three signed originals and, under separate cover, forty copies of this amendments application. We have also enclosed a check in the amount of \$150 for the application fee prescribed in 10 CFR 170. Please contact us at once if you have any questions concerning this request.

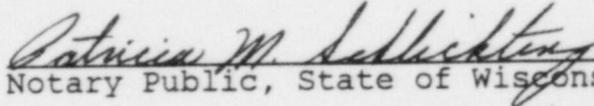
Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Enclosure (Check 904404)

Copies to NRC Resident Inspector
R. S. Cullen, PSCW

Subscribed and sworn to before me
this 8th day of May 1986.


Notary Public, State of Wisconsin

My Commission expires April 29, 1990