UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 191 TO FACILITY OPERATING LICENSE NO. DPR-24

AND AMENDMENT NO. 196 TO FACILITY OPERATING LICENSE NO. DPR-27

WISCONSIN ELECTRIC POWER COMPANY

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-266 AND 50-301

1.0 INTRODUCTION

By application dated September 23, 1998, the Wisconsin Electric Power Company (the licensee) requested amendments to the Technical Specifications (TSs) for Point Beach Nuclear Plant, Units 1 and 2. The proposed amendments would remove the test requirements for snubbers from the TSs. These requirements are already included in the Point Beach Nuclear Plant In-Service Inspection (ISI) Program.

2.0 BACKGROUND

Section 182a of the Atomic Energy Act (the Act) requires applicants for nuclear power plant operating licenses to include TSs as part of the license. In Section 50.36 of Title 10 of the *Code of Federal Regulations* (10 CFR 50.36), the Commission established the regulatory requirements related to the content of TSs. That regulation requires that the TSs include items in five specific categories, including (1) safety limits, limiting safety system settings, and limiting control settings; (2) limiting conditions for operation; (3) surveillance requirements; (4) design features; and (5) administrative controls. However, the regulation does not specify the particular requirements to be included in TSs.

The NRC developed criteria, as described in the "Final Policy Statement on Technical Specifications Improvements for Nuclear Power Reactors" (58 FR 39132), to determine which of the design conditions and associated surveillances should be located in the TSs as limiting conditions for operation. The following four criteria were subsequently incorporated in the regulations by an amendment to 10 CFR 50.36 (60 FR 36953):

1. Installed instrumentation that is used to detect, and indicate in the control room, a significant abnormal degradation of the reactor coolant pressure boundary.

2. A process variable, design feature, or operating restriction that is an initial condition of a design basis accident or transient analysis that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

3. A structure, system, or component that is part of the primary success path and which functions or actuates to mitigate a design basis accident or transient that either assumes the failure of or presents a challenge to the integrity of a fission product barrier.

4. A structure, system, or component which operating experience or probabilistic risk assessment has shown to be significant to public health and safety.

The Commission's Final Policy Statement and documentation related to the revision of 10 CFR 50.36 acknowledged that implementation of these criteria may cause some requirements presently in TSs to be moved out of existing TSs to documents and programs controlled by licensees.

2.0 EVALUATION

The licensee proposes to remove the requirements of TS 15.4.13, "Shock Suppressors (Snubbers)," from the TSs. This TS section defines test requirements for safety-related shock suppressors (snubbers) that are already included under the Point Beach 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 [American Society of Mechanical Engineers] 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 [ASME Code] and applicable addenda as required by 10 CFR 50.55a." The Point Beach ISI Program is currently testing to the requirements of the 1986 Edition of the ASME Code, Section XI.

The applicable snubber testing requirements contained in the 1986 Edition of the ASME Code are included in Articles IWF-1000, 2000, and 5000. The 1987 Addenda to ASME Code, Section XI, 1986 Edition, endorses ASME/ANSI OM Part 4 (OM-4), "Examination and Performance Testing of Nuclear Power Plant Dynamic Restraints." 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 ASME Code requirements. The licensee will implement the OM-4 requirements upon approval of these amendments.

The licensee included a table in its September 23, 1998, application that compares the relevant snubber testing requirements contained in ASME/ANSI OM-4, 1987 Edition, current TS 15.4.13, and the 1986 Edition of the ASME Code. This table is included in the Attachment to this safety evaluation. The table illustrates the fact that the snubber testing requirements from OM-4 are more comprehensive and in general more conservative than the snubber testing requirements contained in the current TSs and meet or exceed the 1986 ASME Code requirements. OM-4 requirements that are relaxations of the 1986 ASME Code requirements are identified in

contained in the current TSs and meet or exceed the 1986 ASME Code requirements. OM-4 requirements that are relaxations of the 1986 ASME Code requirements are identified in Items 6, 9, and 14; however, the licensee provides justification for these relaxations in the respective comparison analysis for each item column in the table.

The elimination of the snubber testing requirements in the Point Beach TS 15.4.13 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 with ASME Code, Section XI, and the applicable addenda.

The objective of the existing TS 15.4.13 is to verify the operability of safety-related snubbers. Snubbers are passive devices used for supporting piping systems. The existing requirements that all snubbers be operable are requirements that (1) do not impact reactor operation, (2) do not identify a parameter that is an initial condition assumption for a design-basis accident or transient, (3) do not identify a significant or abnormal degradation of the reactor coolant pressure boundary, and (4) do not form part of the primary success path that functions or actuates to mitigate a design-basis accident or transient. Snubber surveillance requirements, therefore, do not meet the criteria for inclusion in the TSs, pursuant to 10 CFR 50.36.

Further, the list of safety-related snubbers is contained in the Point Beach Final Safety Analysis Report, Table 6.2-12, and any revisions to this list will therefore be controlled by 10 CFR 50.59, which is consistent with Generic Letter 84-13, "Technical Specification for Snubbers." The provisions for snubber testing will be controlled by the Point Beach ISI Program, which is required by both TS 15.4.2.B.3 and 10 CFR 50.55a.

Therefore, based on the above, the staff concludes that the deletion of TS 15.4.13 is acceptable. Snubber testing at Point Beach will be controlled and required by TS 15.4.2.B.3 and 10 CFR 50.55a.

3.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Wisconsin State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments change a surveillance requirement. The staff has determined that the amendments involve no significant increase in the amounts, and no significant change in the types, of any effluent that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that these amendments involve no significant hazards

consideration and there has been no public comment on such finding (63 *FR* 71977). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Attachment: Table - Comparison of the Relevant Testing Requirements Contained in the ASME Code and TS 15.4.13

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Comparison of the Relevant Testing Requirements Contained in the ASME Code and TS 15.4.13 for TSCR 209

ASME/ANSI OM Part 4, OM-1987 Requirements (OM-4)	*Current PBNP TS 15.4.13 Requirements*	*ASME Section XI 1986 Edition, IWF-1000, 2000 and 5000*	*Comparison Analysis*
1) Applies to snubbers which affect a function described in the plant Safety Analysis Report. Applicable to snubbers whose malfunction, as determined by the owner, would significantly increase the probability of occurrence or the consequences of an accident or the malfunction of equipment important to safety.	Applies to safety-related snubbers.	Applies to Class 1, 2, 3, and MC component supports.	Equivalent requirement. PBNP FSAR Table 6.2-12 lists the safety-related snubbers at PBNP.
2) Describes minimum test procedure content, examination and test result methods, personnel qualification requirements, instrumentation and test requirements including calibration control, and snubber maintenance and modification control.	Describes test requirements for functional tests only.	Describes examination and test result methods, and snubber maintenance and modification control.	OM-4 provides comprehensive additional detail not explicit in TS 15.4.13 or the 1986 edition of the ASME Code.
3) Has preservice inspection requirements including: preservice operability testing, preservice examination requirements, and thermal movement examination requirements.	Does not contain preservice inspection requirements.	Has preservice test requirements including: preservice examination requirements.	OM-4 provides comprehensive additional detail not explicit in TS 15.4.13 or the 1986 edition of the ASME Code.
4) Describes minimum visual inspection criteria.	Does not describe minimum visual inspection criteria.	Describes minimum visual inspection criteria (VT-3).	OM-4 provides comprehensive additional detail not explicit in TS 15.4.13, and is equivalent to the 1986 edition of the ASME Code requirements.
5) Contains visual inspection interval frequencies that are inversely proportional to the number of inoperable snubbers found during the inspection.	Contains visual inspection frequencies in parallel with OM-4.	Does not contain this requirement.	OM-4 and TS 15.4.13 have equivalent requirements, and the 1986 edition of the ASME Code does not contain this requirement.

ATTACHMENT

ASME/ANSI OM Part 4, OM-1987 Requirements (OM-4)	*Current PBNP TS 15.4.13 Requirements*	*ASME Section XI 1986 Edition, IWF-1000, 2000 and 5000*	*Comparison Analysis*
6) Has reduced examination option if an examination of a group of snubbers during (2) successive 18 month examination intervals reveal no unacceptable snubbers. If an unacceptable snubber is revealed during a subsequent required group examination, the sample size for that required examination shall be increased to 100%.	Does not provide this option.	Does not provide this option.	Although TS 15.4.13 and the 1986 edition of the ASME Code do not include this option, This allowance to decrease sample size is appropriate. Having (2) successive 18 month examinations with no unacceptable snubbers is evidence of highly reliable snubbers. Therefore, reducing examination populations is justified in this case. In addition, this option requires 100% examination increase if a unacceptable snubber is revealed during subsequent testing, which is conservative.
7) Includes requirements for examination failure evaluations including identifying failure mode groups and corresponding requirements.	Does not include these requirements.	Includes requirements for evaluation of examination results, but not for failure evaluations and identifying failure mode groups.	OM-4 provides comprehensive additional detail not explicit in TS 15.4.13 and the 1986 edition of the ASME Code.
8) Describes operability testing requirements.	Describes functional test requirements consistent with the operability testing requirements contained in OM-4.	Describes inservice test requirements consistent with the operability testing and functional test requirements of OM-4 and TS 15.4.13. However, does not contain inservice test requirements for snubbers rated 50 kips or greater.	Equivalent requirement. However, the 1986 edition of the ASME Code does not contain test requirements for snubbers rated at 50 kips or greater.
9) Provides an option for qualitative operability testing in lieu of quantitative measurements provided adequate justification can be presented for position.	Does not provide this option.	Does not provide this option.	Although TS 15.4.13 and the 86 edition of the ASME Code do not include this option, this allowance is appropriate. Justification includes the ability of the snubber parameters to be within specifications based upon service history or testing. A test report for each snubber exempted must be provided and verify that the parameter was within specifications to allow the exemption.

ASME/ANSI OM Part 4, OM-1987 Requirements (OM-4)	*Current PBNP TS 15.4.13 Requirements*	*ASME Section XI 1986 Edition, IWF-1000, 2000 and 5000*	*Comparison Analysis*
10) Provides requirements for operability testing failure evaluation, and testing methods.	Does not include these requirements.	Does not include these requirements.	OM-4 provides comprehensive additional detail not explicit in TS 15.4.13 and the 1986 edition of the ASME Code.
11) Requires once every 18 months (+/- 25%) that either 10% or 35, whichever is less, of the snubbers installed be operability tested.	Requires that during each refueling shutdown, approximately 10% of the snubbers installed be functionally tested.	Requires that during each inspection period, 10% of the snubbers rated less than 50 kips be inservice tested.	Equivalent requirement, except the 1986 edition of the ASME Code applies to snubbers rated less than 50 kips. PBNP has (50) snubbers listed as safety-related in FSAR Table 6.2-12.
12) Requires that for each snubber determined to be unacceptable, another sample of at least (1/2) the size of the initial lot be tested until the total number = initial sample size * (1+c/2), where c = number of snubbers found to be unacceptable. The testing of additional sample lots is also required for snubbers determined to be unacceptable in subsequent test lots. Another sample of at least (1/2) the size of the initial lot shall be tested for each subsequent snubber determined to be unacceptable.	Requires that for each snubber found inoperable, an additional 10% of that type snubber be tested until no more failures are found or all units have been tested.	Requires that for each snubber found inoperable, an additional 10% of that type snubber be tested until no more failures are found or all units have been tested.	Equivalent requirement in principle. Each ensures that the examination sample size is expanded as necessary to ensure snubber operability.
13) Includes requirements for records and record keeping.	Includes requirements for records and record keeping similar to the requirements of OM-4.	Includes requirements for records and record keeping similar to the requirements of OM-4.	Equivalent requirement.
14) Does not contain a snubber service life record review requirement.	Requires a snubber record review at least once per 18 months to verify that the indicated service life has not or will not be exceeded prior to the next snubber service life review.	Does not contain a snubber service life record review requirement.	Although OM-4 and the 1986 edition of the ASME Code do not require this service life review, this TS 15.4.13 requirement will be proceduralized in an owner controlled document. PBNP has determined that this review is useful and necessary.