May 5, 2000

Mr. Michael B. Sellman
Senior Vice President and
Chief Nuclear Officer
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, WI 53201

SUBJECT: POINT BEACH NUCLEAR POWER PLANT, UNITS 1 AND 2 - REQUEST FOR ADDITIONAL INFORMATION RE: SECTIONS 3.1, 3.2, AND 3.5 OF IMPROVED TECHNICAL SPECIFICATIONS CONVERSION (TAC NOS. MA7186 AND MA7187)

Dear Mr. Sellman:

By letter dated November 15, 1999, the Wisconsin Electric Power Company submitted a license amendment request to convert the current Technical Specifications to improved Technical Specifications for Point Beach, Units 1 and 2.

The enclosed request was discussed with Mr. Jack Gadzala and other members of your staff during a conference call on April 10, 2000. A mutually agreeable target date of 60 days from the date of this letter for your response was established. If circumstances result in the need to revise the target date, please contact me at (301) 415-1355 at the earliest opportunity.

Sincerely,

/RA/

Beth A. Wetzel, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosure: Request for Additional Information

cc w/encl: See next page

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ACCESSION NO. ML003711818

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REQUEST FOR ADDITIONAL INFORMATION

POINT BEACH NUCLEAR POWER PLANT

IMPROVED STANDARD TECHNICAL SPECIFICATIONS

Point Beach Nuclear Plant Units 1 and 2 Improved TS Review Comments
ITS Section 3.1, Reactivity Control Systems

3.1.1-1 STS 3.1.1, SDM
ITS 3.1.1, SDM
ITS 5.6.4, COLR
CTS 15.03.10
DOC LA1

Point Beach is adopting a Core Operating Limits Report (COLR), and it is stated that "changes to the COLR limits will be controlled in accordance with 10 CFR 50.59."

Comment: Normally, COLRs are established in accordance with requirements set forth in an Administrative Controls section, and controlled in accordance with another Administrative Controls section. To be controlled in accordance with 10 CFR 50.59, the COLR would have to be incorporated into the Final Safety Analysis Report (FSAR), which is acceptable though not typical. Is the Point Beach COLR to be incorporated into the FSAR?

Licensee Response:

3.1.1-2 ITS B3.1.1
STS B3.1.1
ITS SR 3.1.1.1, SDM Verification
JFD 10

Reference to a Reactivity Balance Calculation for verifying SDM is removed from the Bases because an alternative method of using a bounding boron concentration is used.

Comment: Include a brief discussion of the method(s) used for determining SDM in the Bases discussion of the surveillance requirement (SR).

Licensee Response:

ENCLOSURE

3.1.4-1 ITS B3.1.3, MTC
STS B3.1.4, MTC
STS SR 3.1.4.2 and SR 3.1.4.3, lower MTC limit
JFD 2

JFD 2 states that, "Licensee control of the negative limit is adequate since the negative limit is verified within the reload safety analysis, and is indirectly monitored through periodic reactivity anomaly checks. The negative design limit will be controlled in accordance with the 10 CFR 50.59 process. Therefore, the level of safety will be maintained. As such the lower limit is considered non-bounding ...". Neither the CTS nor the ITS contain lower MTC limits.

Comment: While the lower MTC limit is verified within the reload analysis and monitored through anomaly checks, it is not clear why the lower limit is "non-bounding;" why isn't it in the ITS. Since the negative limit is controlled in accordance with the 10 CFR 50.59 process, is its presentation maintained current in the FSAR?

Licensee Response:

3.1.4-2 ITS B3.1.3, MTC
STS B3.1.4, MTC
JFD 7

JFD 7 addresses changes to MTC BOC Bases LCO and SR sections.

Comment: The JFD 7 write-up is missing.

Licensee Response:

3.1.5-1 ITS 3.1.4 Rod Group Alignment Limits, Applicability
STS 3.1.5 Rod Group Alignment Limits, Applicability
CTS 15.3.10
JFD 9
DOC A6

ITS Applicability is Modes 1 and 2 with $K_{eff} \geq 1$, similar to CTS Applicability which requires control rod operability during power and low power operation. STS Applicability is Modes 1 and 2. The JFD 9 justification is that, "Rod group alignment limits are established to maintain acceptable power distribution (which)... is only of concern when the reactor is at power ($K_{eff} \geq 1$) which is consistent with the Mode of Applicability specified for the proposed Shutdown Bank Insertion Limits."

Comment: Rod alignment is relevant during start-up and not just at power after $K_{eff} \geq 1$. Insertion limits are applicable at power after $K_{eff} \geq 1$, and not before. In addition, it is appropriate that if rods are misaligned/inoperable they be fully inserted, and not just to a point at which $K_{eff} < 1$. Recommend that the STS Applicability be adopted.

Licensee Response:

3.1.6-1 ITS 3.1.5, Shutdown Bank Insertion Limits, Applicability
STS 3.1.6, Shutdown Bank Insertion Limits, Applicability
CTS 15.3.10.D.1
DOC A2
JFD 4

The ITS specifies an applicability of Modes 1 and 2 with $K_{eff} \geq 1$, similar to CTS Applicability which requires that shutdown banks must be fully withdrawn whenever the reactor is critical. STS Applicability is Modes 1 and 2 because the shutdown banks must be fully withdrawn prior to the control banks being withdrawn on an approach to criticality.

Comment: The STS applicability is the most appropriate and the easiest to comply with operationally. Recommend adopting the STS applicability.

Licensee Response:

3.1.7-1 ITS 3.1.6, Control Bank Insertion Limits
STS 3.1.7, Control Bank Insertion Limits
ITS SR 3.1.6.3
CTS 15.3.10.F/D
DOC LA2
JFD 8

The CTS defines fully withdrawn control rods as being $\geq$225 steps. The ITS SR 3.1.6.3 states, "...control banks not withdrawn from the core as specified in the COLR," deleting the STS word "fully" before "withdrawn."

Comment: By deleting the word "fully," the meaning of the SR is changed such that the verification need not be performed on some control rods withdrawn <225 steps that are assumed (?) to satisfy correct sequence and overlap limits. Recommend retaining the word "fully."

Licensee Response:

3.1.8-1 ITS 3.1.7, Rod Position Indication, Required Actions
STS 3.1.8, Rod Position Indication, Required Actions
CTS 15.3.10.B/C
DOC L2
JFD 7
JFD 11
JFD 13

The CTS requires control rods with inoperable individual position indicators or demand indicators have their positions checked, or the rod would be declared misaligned. If multiple indicators were inoperable or if the position checks could not be performed, the CTS would ultimately require the unit be shutdown. While the STS allows continued operation at $\leq$50% RTP with one RPI inoperable per group or one demand indicator inoperable per group, it would require unit shutdown with more than one RPI inoperable per group or more than one demand indicator inoperable per group.

Comment: The ITS allows continued operation at $\leq$50% RTP with more than one RPI inoperable per group or more than one demand indicator inoperable per group, that neither the CTS nor the STS permits. Recommend adopting the STS wording and structure with regard to inoperable RPIs per group and inoperable demand indicators per group, the required actions to reduce power to $\leq$50% RTP, and the default condition to be in Mode 3.

Licensee Response:

3.1.8-2 ITS 3.1.7, Rod Position Indication, Applicability
STS 3.1.8, Rod Position Indication, Applicability
CTS 15.3.10.B/C
DOC M2
DOC M3
JFD 10

The CTS Mode of Applicability is $\geq$10% RTP. The ITS Mode of Applicability is Modes 1 and 2 with $K_{eff} \geq 1$. The STS Mode of Applicability is Modes 1 and 2.

Comment: The STS applicability is the most appropriate (RPI Applicability is essential during an approach to criticality) and the STS applicability is easiest to comply with operationally. Recommend adopting the STS applicability.

Licensee Response:

3.1.10-1 Bases for ITS 3.1.8, PHYSICS TESTS Exceptions - MODE 2, Background
Bases for STS 3.1.10, PHYSICS TESTS Exceptions - MODE 2, Background
JFD 4

The STS PHYSICS TESTS Exceptions - MODE 2 Bases Background section state that "...test results are approved prior to continued power escalation...". The ITS PHYSICS TESTS Exceptions - MODE 2 Bases Background section is changed to state that "...test results are independently verified prior to continued power escalation..."

Comment: "Approval" connotes not only verification, but also some form of management acceptance. Do Point Beach procedures not require approval of test results?

Licensee Response:

Point Beach Nuclear Plant Units 1 and 2 Improved TS Review Comments
ITS Section 3.2, Power Distribution Limits

3.2.4-1 ITS B3.2.4 Bases for SR 3.2.4.2
STS B3.2.4 Bases for SR 3.2.4.2
JFD 3

The ITS deletes STS information on incore detector monitoring using thimbles that is not applicable to Point Beach.

Comment: Why not include a brief discussion of the monitoring method(s) used at Point Beach?

Licensee Response:

Point Beach Nuclear Plant Units 1 and 2 Improved TS Review Comments
ITS Section 3.5, ECCS

3.5.1-1 DOC M.4
ITS SR 3.5.1.4
STS SR 3.5.1.4
CTS Table 4.1-3, Item 6 monthly sampling test
JFD 16

In the submittal, ITS SR Frequency following solution volume increase is 24 hours; the STS specifies 6 hours. The submittal in JFD 16 does not adequately justify the difference.

Comment: Adopt STS Frequency.

Licensee Response:
