July 3, 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 3.4 AND 3.9 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 staff needs additional information in order to complete its review of your submittal.

The enclosed request was discussed with Mr. Jack Gadzala and other members of your staff during a conference call on June 13, 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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cc:

Mr. John H. O'Neill, Jr.
Shaw, Pittman, Potts & Trowbridge
2300 N Street, NW
Washington, DC 20037-1128

Mr. Richard R. Grigg
President and Chief Operating Officer
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, WI 53201

Mr. Mark E. Reddemann
Site Vice President
Point Beach Nuclear Plant
Wisconsin Electric Power Company
6610 Nuclear Road
Two Rivers, WI 54241

Mr. Ken Duveneck
Town Chairman
Town of Two Creeks
13017 State Highway 42
Mishicot, WI 54228

Chairman
Public Service Commission
of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

Regional Administrator, Region III
U.S. Nuclear Regulatory Commission
801 Warrenville Road
Lisle, IL 60532-4351

Resident Inspector's Office
U.S. Nuclear Regulatory Commission
6612 Nuclear Road
Two Rivers, WI 54241

Ms. Sarah Jenkins
Electric Division
Public Service Commission of Wisconsin
P.O. Box 7854
Madison, WI 53707-7854

REQUEST FOR ADDITIONAL INFORMATION (RAI)
POINT BEACH NUCLEAR POWER PLANT
IMPROVED TECHNICAL SPECIFICATIONS
SECTION 3.4 - REACTOR COOLANT SYSTEM

RAI 3.4.1-1
ITS 3.4.1 RCS Pressure, Temperature, and Flow DNB Limits
CTS 15.3.10.G Operational Limitations
JFD-1 RCS Pressurizer Pressure

The improved Technical Specification (ITS) retains the current TS (CTS) Pressurizer Pressure Limits of "≥2205 psig during operation at 2250 psia, ≥1955 psig at 2000 psia."

Comment: There is not a discussion in the Bases concerning when either of these limits apply, and whether the limits change linearly between these pressures. Provide an explanation.

Licensee Response:

RAI 3.4.1-2
ITS 3.4.1 RCS Pressure, Temperature, and Flow DNB Limits
CTS 15.3.10.G Operational Limitations
DOC M.2 and JFD-2

The ITS adopts a new RCS average temperature limit to correspond with the new expanded Mode 1 Applicability in the ITS.

Comment: There is not a discussion in the Bases concerning the basis for these limits. Provide an explanation.

Licensee Response:

RAI 3.4.1-3
ITS 3.4.1 RCS Pressure, Temperature, and Flow DNB Limits
CTS 15.3.10.G Operational Limitations
DOC M.3

The CTS does not provide Required Actions if the DNB parameters are not maintained within limits, while the ITS provides 2 hours to restore the parameters to within limits or be in Mode 2 in 6 hours.

Comment: If the DNB parameters are not within limits, the CTS would require application of CTS 15.3.0.B which requires shutdown. This is a less restrictive change.

Licensee Response:

RAI 3.4.3-1
ITS 3.4.3 RCS P/T Limits
CTS 15.3.1.B
R.1 and R.2

The Steam Generator P/T Limits and the Pressurizer P/T Limits are being relocated to the FSAR.

Comment: Is Point Beach to have a Technical Requirements Manual (TRM) or equivalent? If so, will these and other relocated limits be located there?

Licensee Response:

RAI 3.4.5-1
ITS 3.4.5 RCS Loops-MODE 3
ITS B 3.4.5 LCO section
STS B 3.4.5 LCO section
JFD-5

Examples of tests that require all RCPs to be de-energized have been deleted from the ITS because they are not applicable to Point Beach. No examples are provided.

Comment: Recommend replacing the invalid examples with plant-specific examples.

Licensee Response:

RAI 3.4.6-1
ITS 3.4.6 RCS Loops-MODE 4
CTS 15.3.1.B.2.a
ITS LCO 3.4.6 Note 2
DOC M.2 and DOC M.3

The CTS prohibits starting an RCP if there is not an adequate pressure-absorbing volume in either the steam generators or the pressurizer. This limitation is deleted from the ITS because "no method exists to verify the volume ..." Furthermore, this deletion is described as a more restrictive change.

Comment: This justification is inadequate. While the PTLR probably will adequately address this concern (in the PTLR curves), this is not addressed. It appears that this CTS restriction is ignored in the ITS and the change is inaccurately categorized. Provide adequate justification for deleting these requirements.

Licensee Response:

RAI 3.4.6-2
ITS RCS Loops-MODE 4
ITS B 3.4.6 LCO section
STS B 3.4.6 LCO section
JFD-4

An example of a test that requires all RCPs to be de-energized has been deleted from the ITS because it is not applicable to Point Beach. No examples are provided.

Comment: Recommend replacing the invalid example with plant-specific example(s)?

Licensee Response:

RAI 3.4.7-1
ITS 3.4.7 RCS Loops-MODE 5, Loops Filled
ITS 3.4.7 LCO, Note 2
STS 3.4.7 LCO, Note 2
DOC M.2 and JFD-5

The CTS allows an RHR loop to be temporarily out of service, for an unspecified period, to perform surveillance requirements (SRs). The STS limits the time of inoperability to 2 hours. The ITS changes this time to 4 hours because 2 hours would be too limiting.

Comment: What makes Point Beach unique such that 2 hours is insufficient to perform required surveillances? Either provide a plant-specific justification, a TSTF change proposal, or adopt the STS time of 2 hours.

Licensee Response:

RAI 3.4.7-2
ITS 3.4.7 RCS Loops-MODE 5, Loops Filled
ITS B 3.4.7, LCO section
STS B 3.4.7, LCO section
JFD-3

The ITS Bases does not include the discussion about rod drop no-flow tests because they are not performed at Point Beach. The JFD-3 states that the "Bases description of startup testing is revised to reflect the actual testing performed at Point Beach." The ITS does not replace the deleted discussion with an applicable test to which Note 1 would apply.

Comment: Recommend adding appropriate discussion to ITS Bases.

Licensee Response:

RAI 3.4.7-3
ITS 3.4.7 RCS Loops-MODE 5, Loops Filled
ITS LCO 3.4.7 b, ITS SR 3.4.5.2 and ITS SR 3.4.6.2.
STS LCO 3.4.7.b
JFD 7

ITS 3.4.7 specifies that the steam generator level must be $\geq$30 percent narrow range. JFD 7 indicated that narrow range was added to avoid possible interpretation problems.

Comment: Recommend also adding "narrow range" to ITS SR 3.4.5.2 and ITS SR 3.4.6.2. Request you submit a TSTF change proposal to modify the STS.

Licensee Response:

RAI 3.4.9-1
ITS 3.4.9 RCS Pressurizer
ITS 3.4.9 LCO statement
STS 3.4.9 LCO statement
JFD-1

The specific pressurizer operability requirements of water level and heater capacity are not mentioned in the proposed ITS LCO statement and are listed in the surveillance requirements.

Comment: Include the specific pressurizer operability requirements of water level and heater capacity in the LCO statement, as is done in both the CTS and STS.

Licensee Response:

RAI 3.4.9-2
ITS 3.4.9 RCS Pressurizer
ITS 3.4.9 Condition A
STS 3.4.9 Condition A
DOC M.3 and JFD-2

The ITS adds a new more restrictive LCO pressurizer level limit for Mode 1, based upon the "loss of normal feedwater accident analyses." If the Mode 1 pressurizer level limit is not met, then 6 hours is provided in proposed ITS Required Action A to restore level.

Comment: Neither the CTS nor the STS provide 6 hours to restore pressurizer level. Justify why the loss of normal feedwater accident analyses for Mode 1 allows the time (6 hours) to restore pressurizer level. Recommend including this discussion in the Bases. Also, is there no mass addition concern in Modes 2 and 3 that would necessitate a lower pressurizer level limit?

Licensee Response:

RAI 3.4.12-1
ITS 3.4.12 LTOP
STS 3.4.12 Required Action D.1
JFD-10

When an accumulator's pressure is greater than that allowed in the PTLR and it cannot be isolated, STS Required Action D.1 is to increase RCS cold leg temperature in order to exit the applicability of the LCO. This is proposed to be deleted in the ITS because it "could be easily misinterpreted as an allowance to enter the identified condition...", and such an action to restore compliance is not necessary to state.

Comment: The staff does not understand the potential misinterpretation; discuss. Also, STS Required Action D.1 is not an action to return conditions to that required by an LCO, rather it is an action to exit an applicability of an LCO, similar to Required Action D.2, and deleting D.1 could possibly be misinterpreted to mean that D.2 is the sole method for responding to the condition.

Licensee Response:

RAI 3.4.12-2
ITS 3.4.12 LTOP
ITS SR 3.4.12.3
STS SR 3.4.12.3
JFD-12

The ITS modifies STS SR 3.4.12.3, which verifies accumulators are isolated, to require its performance only when the accumulator(s) are required to be isolated. The SR is modified by an added phrase to the SR description.

Comment: Recommend adding the modifying statement to ITS SR 3.4.12.3 as a Note, similar to the Note added to ITS SR 3.4.12.2, for consistency in presentation.

Licensee Response:

RAI 3.4.12-3
ITS 3.4.12 LTOP
ITS 3.4.12 LCO statement
STS 3.4.12 LCO statement
JFD-1

The ITS 3.4.12 LCO statement deletes reference to the LTOP "configuration" as a system.

Comment: The CTS refers to the LTOP System, as does the STS. The ITS refers to LTOP trains of equipment. When LTOP is controlling pressure, it is appropriate to refer to the LTOP equipment configurations and functioning as the LTOP System, it seems awkward not to refer to it as the LTOP System.

Comment: The CTS refers to the LTOP System, as does the STS. The ITS refers to LTOP equipment configurations and functioning as the LTOP System; it seems awkward not to refer to it as the LTOP System.

Licensee Response:

RAI 3.4.13-1
ITS 3.4.13 RCS Operational Leakage
ITS 3.4.13 Require Action A.1 Completion Time
STS 3.4.13 Require Action A.1 Completion Time
DOC A.2 and JFD-3

The CTS provides 4 hours to conduct an evaluation of the leakage, and to commence a shutdown no later than 24 hours. The STS provides 4 hours to reduce the leakage in Required Action A, and to shutdown in 6 hours per Condition B.

Comment: Adopt the STS time to reduce leakage; Require Action A.1 Completion Time of 4 hours. The CTS time of 24 hours is to commence a shutdown, and not time to reduce leakage.

Licensee Response:

RAI 3.4.13-2
ITS 3.4.13 RCS Operational Leakage
CTS 15.3.1.D Leakage of Reactor Coolant
DOC LA.1, DOC LA.2, and DOC LA.3

Details regarding RCS leakage are being “moved to licensee control.”

Comment: Identify the location to which the details are being moved and the change control procedure to be utilized.

Licensee Response:

RAI 3.4.13-3
ITS 3.4.13 RCS Operational Leakage
CTS 15.4.3 Primary System Testing Following Opening
DOC R.1

Comment: The justification to DOC R.1 for relocating CTS 15.4.3 is missing.

Licensee Response:

RAI 3.4.13-4
ITS 3.4.13 RCS Operational Leakage
CTS 15.3.1.D Basis
DOC A.5

DOC A.5 is identified with CTS 15.3.1.D Basis. However, DOC A.5 is not included in the submittal.

Comment: Licensee provide DOC A.5.

Licensee Response:

RAI 3.4.14-1
ITS 3.4.14 RCS PIV Leakage
STS SR 3.4.14.2 and STS SR 3.4.14.3
JFD-1

The ITS does not include the STS surveillances SR 3.4.14.2 and SR 3.4.14.3.

Comment: Why not?

Licensee Response:

RAI 3.4.15-1
ITS 3.4.15 RCS Leakage Detection Instrumentation
CTS 15.4.1, Table 15.4.1-1, items 36-07 and 43
DOC LA.1

Surveillance Requirements on the Air Ejector Monitor and the Volume Control Tank Level Instrumentation are being “moved to licensee control.”

Comment: Identify the location (TRM?) to which the Surveillance Requirements are being moved and the change control procedure to be utilized.

Licensee Response:

RAI 3.4.16-1
ITS RCS Specific Activity
CTS 15.4.1, Table 15.4.1-2
DOC LA.1, DOC LA.2, and DOC LA.3

Details regarding RCS sampling are being "moved to licensee control."

Comment: Identify the location to which the details are being moved and the change control procedure to be utilized.

Licensee Response:

RAI 3.4.16-2
CTS 15.3.1.E Maximum Reactor Coolant Oxygen and Chloride and Fluoride Concentration for Power Operation
DOC R.1
CTS 15.3.1.E is being relocated to documents outside the TS.

Comment: Identify the location to which CTS 15.3.1 is being relocated (TRM?) and the change control procedure to be utilized.

Licensee Response:

POINT BEACH IMPROVED TECHNICAL SPECIFICATIONS
SECTION 3.9 - REFUELING OPERATIONS
REQUEST FOR ADDITIONAL INFORMATION

RAI 3.9.3-1
ITS 3.9.3 Containment Penetrations
ITS B 3.8.3 LCO section
JFD-2 and DOC L.3

The ITS Bases includes words at the end of the LCO section concerning the allowance to leave containment airlock doors open during fuel movement and other core alts.

Comment: The middle paragraph of DOC L.3 seems to be a very appropriate paragraph to include in the Bases, on why it is acceptable for both airlock doors to be open during fuel movement and other core alts.

Licensee Response:

RAI 3.9.3-2
ITS 3.9.3 Containment Penetrations
ITS SR 3.9.3.2 Note
STS SR 3.9.4.2
JFD-4

The ITS SR 3.9.3.2 includes a note that the SR is not applicable to valves in isolated penetrations, to avoid confusion over whether a failed surveillance conducted on an isolated is a failed SR that would require a TS condition entry.

Comment: The change is appropriate; request you submit a TSTF change proposal to modify the STS.

Licensee Response:

RAI 3.9.4-1
ITS 3.9.4 RHR and Coolant Circulation-High Water level
STS 3.9.5 Required Action A.4
JFD-3

The ITS does not include STS Required Action A.4, to close containment penetrations to the outside atmosphere, because it is not included in the Point Beach current licensing basis.

Comment: Perhaps the CTS, or current licensing basis, should have included this action. Are there any dose calculations (resulting from a core melt accident) to support this exclusion?

Licensee Response:

RAI 3.9.5-1
ITS 3.9.5 RHR and Coolant Circulation-Low Water level
STS 3.9.6 Required Action B.3
JFD-2

The ITS does not include STS Required Action B.3, to close containment penetrations to the outside atmosphere, because it is not included in the Point Beach current licensing basis.

Comment: Perhaps the CTS, or current licensing basis, should have included this action. Are there any dose calculations, resulting from a core melt accident, to support this exclusion?

Licensee Response:
