



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

July 10, 1979

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

Dear Mr. Denton:

DOCKET NOS. 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 59
RADIATION PROTECTION MANAGER
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In response to the request of the NRC Staff, Wisconsin Electric Power Company (Licensee) hereby proposes amendments to Facility Operating Licenses DPR-24 and DPR-27 in accordance with Part 50.59 of Title 10 of the Code of Federal Regulations to incorporate certain additions to the Technical Specifications for Point Beach Nuclear Plant Units 1 and 2. These additions address qualification requirements for the Radiation Protection Manager (RPM) as delineated in Regulatory Guide 1.8, Revision 1.

An exchange of correspondence between the NRC and ourselves regarding Revision 1 of Regulatory Guide 1.8 began with our letter of October 23, 1975. However, the formal request that we propose a technical specification regarding RPM qualifications was contained in a letter from Mr. D. Eisenhut dated April 19, 1978. In our response dated June 30, 1978, we requested a meeting with the NRC to resolve our remaining concerns. The meeting subsequently took the form of a conference telephone call in which our main concerns were discussed and alternatives were proposed. Based on this interchange of information, we developed the proposed technical specification attached herewith which assures the level of competence intended by Regulatory Guide 1.8 and provides the necessary flexibility for plant staffing.

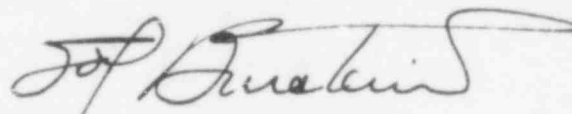
We have reviewed the requirements of 10 CFR Part 170.22 regarding the schedule of fees for facility license amendments and determined that this license amendment for DPR-24 should be classified as a Class II amendment. The amendment is administrative in nature and has no safety or environmental significance. The license amendment for DPR-27 is a duplicate of the Unit 1 amendment and is, therefore, a Class I amendment. We further have determined that whereas the amendment application is provided as a result of a written Commission request, is intended to clarify the technical specification for the convenience of the Commission, and has no safety significance, this application should be exempt from fees.

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We have provided herewith three signed originals and thirty-seven copies of this application for license amendments. Should you have any questions concerning this material, please notify us at your convenience.

Very truly yours,



Executive Vice President

Sol Burstein

Enclosures

Subscribed and sworn to before me
this 17th day of July, 1979.


Notary Public, State of Wisconsin

My Commission expires July 6, 1980

15.6.4 Training

15.6.4.1 A retraining and replacement training program for the facility staff shall be maintained under the direction of the Training Supervisor and shall meet or exceed the requirements and recommendations of Section 5.5 of ANSI N18.1-1971 and Appendix "A" of 10 CFR Part 55.

15.6.4.2 A training program for the Fire Brigade shall be maintained under the direction of the Fire Protection Supervisor and shall meet or exceed the requirements of Section 27 of the NFPA Code-1976, except that the meeting frequency may be quarterly.

15.6.5 Review and Audit

15.6.5.1 Duty and Call Superintendents

- a. To assist and counsel the Shift Supervisor in case of Significant Operating Events, a Duty and Call Superintendent Group has been established. The Duty and Call Superintendent Group shall consist of any qualified person designated by the Manager - Nuclear Power Division.
- b. In the event of a reportable occurrence, the Shift Supervisor shall communicate with at least one Duty and Call Superintendent before taking other than the immediate on-the-spot action required. One Duty and Call Superintendent will be assigned to be "on call" at all times. The Duty and Call Superintendent provides continuously available counsel, call out backups, and review to the Shift Supervisor.

15.6.5.2 Manager's Supervisory Staff

FUNCTION

15.6.5.2.1 The Manager's Supervisory Staff (MSS) shall function to advise the Manager - Nuclear Power Division on all matters related to nuclear safety.

15.6.3 Facility Staff Qualifications

15.6.3.1 Each member of the facility staff shall meet or exceed the minimum qualifications of ANSI N18.1-1971 for comparable positions.

15.6.3.2 Except as provided in 15.6.3.3, either the Radiochemical Engineer or the Health Physicist shall meet the following requirements:

- a. The individual shall have a bachelor's degree or the equivalent in a science or engineering subject, including some formal training in radiation protection. For purposes of this paragraph, "equivalent" is as follows:
 - (1) Four years of formal schooling in science or engineering; or
 - (2) Four years of applied radiation protection experience at a nuclear facility; or
 - (3) Four years of operational or technical experience or training in nuclear power; or
 - (4) Any combination of the above totalling four years.
- b. Except as provided in d., below, the individual shall have at least five years of professional experience in applied radiation protection. A master's degree in a related field is equivalent to one year of experience and a doctor's degree in a related field is equivalent to two years of experience.
- c. Except as provided in d., below, at least three of the five years of experience shall be in applied radiation protection work in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power plants.
- d. If the individual has a bachelor's degree specifically in health physics, radiological health, or radiation protection, at least two years of professional experience is required; if the individual has a master's or a doctor's degree specifically in health physics, radiological health, or radiation protection, at least one year of professional experience is required. This experience shall be in applied radiation protection in a nuclear facility dealing with radiological problems similar to those encountered in nuclear power plants.

15.6.3.3 In the event the position of Radiochemical Engineer or Health Physicist is vacated and neither the remaining individual nor the proposed replacement meets the qualifications of 15.6.3.2, but one of these individuals is determined to be otherwise well qualified, then concurrence of NRC shall be sought in approving the qualification of that individual.