



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2040, MILWAUKEE, WI 53201

January 28, 1980

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
MODIFICATION TO CHANGE REQUEST NO. 33
RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On June 4, 1976, Wisconsin Electric Power Company (Licensee) submitted a license amendment request which included proposed ALARA Technical Specifications for review and approval by the U. S. Nuclear Regulatory Commission (NRC). The proposed Technical Specifications provided radioactive effluent quantity limits which were related to the 10 CFR Part 50 Appendix I design objective dose limits by specific scaling procedures detailed in the Specifications. It was Licensee's intent to satisfy, with these proposed Specifications, the requirements of Sections 50.34a, 50.36a, and Appendix I to 10 CFR Part 50. The NRC has not responded to the original Change No. 33 Request.

On July 11, 1978, the NRC sent all PWR licensees a letter requesting commitment to and submittal of the NRC's own Radiological Effluent Technical Specifications (RETS). The RETS were subsequently modified and presented by the NRC to all licensees at regional meetings held in November 1978 with a tentative schedule for submittal by the licensees. Apparently due to a mailing error, Wisconsin Electric did not receive a request letter and submittal schedule until July 2, 1979. Licensee also received in July 1979 a second revision to the NRC's RETS in the form of NUREG-0472, "Radiological Effluent Technical Specifications for PWRs".

On November 27, 1979, the NRC sent another letter which further revised the radiological environmental monitoring program requirements and requested that licensees submit a RETS application within 30 days of the receipt of that letter.

The purpose of this modification to our original Technical Specification change request is to respond to these additional requirements which have been promulgated subsequent to our original submittal.

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The attached proposed page changes for the Point Beach Nuclear Plant Technical Specifications have been patterned after the recommendations in NUREG-0472 but retain the general format of the present specifications. These changes and additions address the following areas:

1. The definition of a channel check has been changed to more closely follow the NUREG-0472 definition.
2. The present Section 15.3.9, "Effluent Releases", has been rewritten to incorporate the limiting conditions for operation (LCO) recommended in NUREG-0472. The revised Section includes proposed specifications on effluent monitoring instrumentation, permissible radioactive waste release rates, design objective annual releases for liquid and gaseous effluents and specifications on operability of radioactive effluent waste treatment systems.
3. A new Section 15.4.16, "Radioactive Effluent Monitoring and Control System", has been added to the surveillance requirements. This Section includes specifications on effluent monitoring instrumentation surveillance, radioactive liquid and gaseous waste sampling and analysis frequencies, and specifications for the demonstration of operability of the liquid and gaseous radwaste processing systems.
4. Changes have been proposed to Specification 15.4.10, "Operational Environmental Monitoring", to add several environmental sampling locations.
5. As recommended in NUREG-0472, a site plan figure defining the plant site exclusion area boundary has been added to Specification 15.5.1, "Site".
6. The requirement to review all unplanned releases of radioactive materials has been added to the responsibilities of the Manager's Supervisory Staff, as defined in Specification 15.6.5.
7. Three specific conditions concerning releases of radioactive material have been added to the reporting requirements listed in Specification 15.6.9.2.A, "Reportable Occurrences - Prompt Notification with Written Followup".

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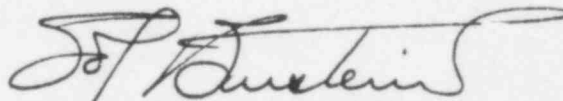
As discussed in our September 24, 1979 response to IE Bulletin 79-19, "Packaging of Low-Level Radioactive Wastes", management approved instructions and procedures are already in effect to provide administrative controls on the chemical and physical form of low-level radioactive solid waste and on the packaging integrity and preparations for shipping these wastes. The solid waste volume shipped from Point Beach Nuclear Plant has been small in comparison to other similar facilities, and compliance with regulations on waste packaging and shipment has been excellent. We believe that existing plant procedures fulfill the requirement for a Process Control Program and that no further development of additional controls is required.

Elements of these proposed Specifications make reference to an Offsite Dose Calculation Manual (ODCM). This Manual is presently being developed. The Manual will contain the methodology and parameters necessary for calculation of those gaseous and liquid release quantities equivalent to the 10 CFR 50 Appendix I design objective doses. It is anticipated that this Manual will be completed by June 1, 1980.

We believe the Technical Specifications proposed in this modification to our license amendment request satisfy the requirement of the Commission Regulations as found in 10 CFR Section 50.34a and 50.36a and Appendix I to 10 CFR Part 50 and provide assurance that releases of radioactive materials to unrestricted areas during normal reactor operations, including expected operational occurrences, will remain as low as is reasonably achievable.

We are enclosing three signed originals and, under separate cover, forty copies of this modified license amendment request. Should you or your Staff have any questions regarding this submittal, please contact us.

Very truly yours,

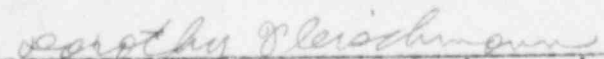


Executive Vice President

Sol Burstein

Enclosure

Subscribed and sworn to before me
This 28th day of January, 1980.


Notary Public, State of Wisconsin

My Commission expires July 6, 1980

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