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10CFR50.4

10CFR50.90

March 24, 1993

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 158
MODIFICATIONS TO TECHNICAL SPECIFICATIONS
SECTION 15.6, "ADMINISTRATIVE CONTROLS"
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 50.90, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP), Units 1 and 2, respectively, to incorporate changes to the plant Technical Specifications. The proposed changes update several position titles in PBNP Technical Specifications Section 15.6, "Administrative Controls," as a result of a recent Nuclear Power Department organization change. The proposed changes also revise the required Manager's Supervisory Staff (MSS) composition and duties in Section 15.6.5, "Review and Audit." Marked-up Technical Specifications pages, a safety evaluation, and a no significant hazards consideration are enclosed.

DESCRIPTION OF CURRENT LICENSE CONDITION

Technical Specifications Section 15.6, "Administrative Controls," specifies the administrative functions and responsibilities of on-site and off-site personnel and organizations associated with the Point Beach Nuclear Plant.

Section 15.6.5, Specification 15.6.5.1, "Manager's Supervisory Staff," describes the composition, duties, and responsibilities of the Manager's Supervisory Staff (MSS). The Point Beach MSS is the equivalent of the Unit Review Group (URG) specified in Revision 5 of the Westinghouse Standard Technical Specifications.

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DESCRIPTION OF PROPOSED CHANGES

This Technical Specification change request proposes to modify Section 15.6 to update several position titles. All title changes are administrative only. Responsibilities of the affected positions remain unchanged. However, several modifications to the MSS duties are proposed to more closely reflect the intent of Revision 5 of the Westinghouse Standard Technical Specifications and remove a redundant review of the Facility Fire Protection Program implementing procedures. In addition, this change request proposes to modify Section 15.6.5 to revise the composition of the MSS membership. The proposed changes are as follows:

1. A modification to Specification 15.6.2.2.g to change "Superintendent - Operations," to "Operations Manager."
2. A modification to Specifications 15.6.3.2 and 15.6.3.3 to change "Superintendent - Health Physics," to "Health Physics Manager."
3. A modification to Specification 15.6.4.1 to change "Superintendent - Training," to "Training Manager."
4. A modification to Specification 15.6.5.1.2 to revise the MSS composition. The proposed change is as follows:

15.6.5.1.2 The Manager's Supervisory Staff shall be selected and designated by the Manager from a list of qualified individuals in the following disciplines:

Operations
Maintenance
Health Physics
Engineering
Licensing
Training
Chemistry

5. An additional Specification adds qualification requirements for MSS members. The proposed addition is as follows:

15.6.5.1.3 Each individual representing a MSS discipline shall meet or exceed the qualification requirements specified in Section 4.2 of ANSI N18.1-1971, except as described in Specification 15.6.3.2 for the Health Physics Manager.

6. An additional Specification adds a description of the MSS Chairman selection process. The addition is as follows:

- 15.6.5.1.4 The MSS Chairman shall be selected by the Manager from a group specifically designated by the Manager and shall meet or exceed the qualification requirements specified in Section 4.2.1 of ANSI N18.1-1971. The Chairman shall ensure that the proper disciplines are present to address the items to be brought to the MSS for review in accordance with Specification 15.6.5.1.8.
- 7. Existing Specification 15.6.5.1.3 is being deleted to remove the option of selecting alternate members.
- 8. A modification to Specification 15.6.5.1.5 proposes new requirements for an MSS quorum and removes alternate members from the quorum. The proposed change is as follows:
 - 15.6.5.1.6 A quorum of the MSS shall consist of the Chairman and four members representing four different disciplines. In addition, the quorum shall be representative of the issues being discussed.
- 9. An additional Specification to require that an updated list of MSS members be maintained. The proposed addition is as follows:
 - 15.6.5.1.7 A list of MSS members shall be maintained and shall be updated at least annually.
- 10. Modifications to Specification 15.6.5.1.6, which has been renumbered 15.6.5.1.8, proposes several changes to the MSS duties for clarification and conformance to the Westinghouse Standard Technical Specifications. Subparts of this Specification have been changed to read as follows:
 - 15.6.5.1.8.e Periodically review plant operations for potential hazards to nuclear safety.
 - 15.6.5.1.8.f Review violations of Technical Specifications, such reviews to include reports, evaluations and recommendations.
 - 15.6.5.1.8.h Review the Facility Fire Protection Program at least once per 24 months to ensure the program meets established commitments and requirements.

BASIS AND JUSTIFICATION

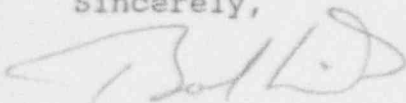
This Technical Specification change request is the result of a self-identified deficiency in the Technical Specification description of the MSS composition and selection requirements. We determined the present specifications did not adequately support our current needs by limiting our ability to fully utilize existing expertise. Therefore, we propose these administrative changes to more adequately support the review and approval processes accomplished by the Manager's Supervisory Staff.

In addition, changes to several MSS duties are proposed to more closely reflect the Westinghouse Standard Technical Specifications and provide clarification where necessary. We have determined that the proposed amendments do not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, we conclude that the proposed amendments meet the categorical exclusion requirements of 10 CFR 51.22(c)(9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

In summary, the proposed changes contained in this package will, when approved, result in an improvement to the safe operation of Point Beach Nuclear Plant. For this reason, we request that you process this change at your earliest opportunity.

Please contact us if you have any questions.

Sincerely,

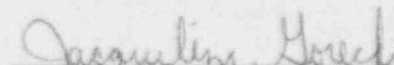


Bob Link
Vice President
Nuclear Power

DAW/jg

Enclosures

Subscribed and sworn before me
this 24th day of March 1993.



Notary Public, State of Wisconsin

My commission expires 10-27-96.

cc: NRC Resident Inspector
NRC Regional Administrator, Region III
Public Service Commission of Wisconsin

TECHNICAL SPECIFICATION CHANGE REQUEST 158
SAFETY EVALUATION

INTRODUCTION

Wisconsin Electric Power Company (Licensee) is applying for amendments to Facility Operating License DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. The requested amendments propose changes to several position titles in Section 15.6, "Administrative Controls," as a result of recent Nuclear Power Department organization changes. The amendments also propose a change to the composition and selection requirements for Manager's Supervisory Staff (MSS) members in Section 15.6.5, "Review and Audit."

EVALUATION

This Technical Specification change request is being submitted as the result of a self-identified deficiency in the Technical Specifications description of the MSS composition and selection requirements.

As a result of Nuclear Power Department organization changes, the positions classified as "Superintendent" were changed to "Manager." Therefore, we propose changes to Technical Specifications 15.6.2.2.g, 15.6.3.2, 15.6.3.3, and 15.6.4.1 to reflect this organization change. These changes are administrative only. The duties and responsibilities of these positions, with the exception of the proposed changes below, have not changed.

Technical Specification 15.6.5.1, "Manager's Supervisory Staff," currently selects MSS members according to the individual's position. We have determined that this is overly restrictive as it does not allow additional qualified personnel to be involved in the decisions concerning various nuclear safety issues, except for alternates of which only two can vote on issues brought before the MSS. Therefore, we propose to allow individuals to be assigned as regular members of the MSS to represent a proposed discipline according to their specific areas of expertise rather than by their current positions. The individuals will be selected from various areas of expertise within the Nuclear Power Department and included on a list of designated members. The proposed disciplines encompass the personnel represented in the present Technical Specifications as shown below. All disciplines serve line-type functions with the exception of Training, Chemistry, and Licensing, which include personnel from non-line disciplines:

<u>Discipline</u>	<u>Previous Position</u>
1. Operations	General Superintendent - Operations Superintendent - Operations
2. Maintenance	General Superintendent - Maintenance Superintendent - Maintenance Superintendent - Instrumentation & Control

3. Health Physics	Superintendent - Health Physics
4. Engineering	Superintendent - Technical Services
5. Licensing	None
6. Training	Superintendent - Training
7. Chemistry	Superintendent - Chemistry

In addition, each individual representing a MSS discipline will be required to meet or exceed the qualification requirements specified in Section 4.2, "Managers," of ANSI N18.1-1971, "Selection and Training of Nuclear Power Plant Personnel," except as described in Specification 15.6.3.2 for the Health Physics Manager, which contains more stringent requirements. These requirements will ensure that all MSS members meet or exceed the required level of training and qualification.

The Chairman will be selected by the Manager--Point Beach Nuclear Plant from a group of specifically designated individuals who meet or exceed the qualification requirements specified in Section 4.2.1, "Plant Managers," of ANSI N18.1-1971. The Chairman will then be responsible to ensure that the proper disciplines are present to adequately address the issues to be discussed at the meeting.

Because the list of possible qualified MSS meeting attendees will be substantially increased, there will no longer be a need for designated alternates. Therefore, the proposed Technical Specification change removes the option of designating alternate MSS members.

In order to ensure a diverse quorum at each MSS meeting and to reflect the change in number of MSS members from nine to at least seven, a quorum will now consist of the Chairman plus four members representing four different disciplines. In addition, the quorum will be representative of the issues being discussed to ensure the necessary expertise is available to adequately address the issues presented to the MSS.

A list of MSS members will be maintained to aid the Chairman in selecting personnel for each meeting. This list will be updated at least annually to ensure only qualified and properly trained personnel remain as MSS members. This requirement is consistent with existing requirements which specified MSS members by position title and required the appointment of alternate members in writing.

Finally, several changes to the MSS duties will provide enhanced clarification and conformance to the Westinghouse Standard Technical Specifications. In Specification 15.6.5.1.8, the phrase "nuclear safety hazards" was changed to "hazards to nuclear safety" to agree with the terminology in other PBNP documentation and also conform to accepted terminology in the Westinghouse Standard Technical Specifications. The requirement for MSS "investigation" of Technical Specification violations was changed to "review" of Technical Specification violations to agree with the function of the MSS. This review is performed by specific groups within the Nuclear Power Department organization.

In Specification 15.6.5.1.h, the requirement for MSS review of the Facility Fire Protection Program implementing procedures was removed. This requirement was originally added to the Technical Specifications in the mid-1970s as a result of guidance contained in NRC Branch Technical Position APCSB 9.5-1, "Guidance for Fire Protection for Nuclear Power Plants." Because these procedures are reviewed biennially by their responsible groups and maintained by an on-site Fire Protection Coordinator and off-site Fire Protection Engineer, we believe an additional detailed review by the MSS is unwarranted. However, concerns raised during the course of the biennial reviews are subsequently brought to the MSS for review and resolution. Also, Specifications 15.6.8.2 and 15.6.8.3 define the requirements for review and approval of procedures and their revisions, of which the Fire Protection Program implementation procedures are included.

CONCLUSIONS

In summary, the proposed changes to the PBNP Technical Specifications will enhance the review and approval function of the Manager's Supervisory Staff by fully utilizing expertise within the Wisconsin Electric Nuclear Power Department. The proposed changes are consistent with the Point Beach Final Safety Analysis Report (FSAR), other utility practices, and meet the intent of the Westinghouse Standard Technical Specifications. Therefore, the proposed revisions will ensure and enhance the continued safe operation of the Point Beach Nuclear Plant.

TECHNICAL SPECIFICATION CHANGE REQUEST 158
"NO SIGNIFICANT HAZARDS CONSIDERATION"

In accordance with the requirements of 10CFR50.91(a), Wisconsin Electric Power Company (Licensee) has evaluated the proposed changes against the standards of 10CFR50.92 and has determined that the operation of Point Beach Nuclear Plant, Units 1 and 2, in accordance with the proposed amendments, does not present a significant hazards consideration.

A proposed facility operating license amendment does not present a significant hazards consideration if operation of the facility in accordance with the proposed amendment will not:

1. Create a significant increase in the probability or consequences of an accident previously evaluated.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Will not create a significant reduction in a margin of safety.

The proposed changes are administrative in nature. They consist of title changes due to organizational changes and allow assignment of qualified personnel to the Manager's Supervisory Staff as needed to discuss and resolve issues related to the safe and reliable operation of PBNP. The changes will allow the Chairman of the Manager's Supervisory Staff to fully utilize the expertise and experience within the Wisconsin Electric Nuclear Power Department for MSS members and will result in more critical and thorough reviews of plant issues and events. In addition, there is no physical change to the facility, its systems, or its operation. Operation of PBNP in accordance with these proposed amendments cannot create an increase in the probability or consequences of an accident previously evaluated, create a new or different kind of accident, or result in a significant reduction in a margin of safety. Therefore, the proposed changes do not present a significant hazards consideration.