



**Wisconsin  
Electric**  
POWER COMPANY

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VPNPD-95-017

NRC-95-011

10CFR50.4

10CFR50.90

February 24, 1995

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
REVISION TO TECHNICAL SPECIFICATIONS CHANGE REQUEST 176  
ADMINISTRATIVE CHANGES  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On January 24, 1995, we submitted Technical Specifications Change Request 176, "Administrative Changes." The proposed changes modified Technical Specifications Section 15.6.5, "Review and Audit," and Section 15.7.8, "Administrative Controls," by removing Quality Assurance audit frequencies; removing Section 15.6.5.4, "Emergency Plan Reviews;" and extending the radioactive effluent reporting period from semiannual to annual. Included in this submittal was the removal of fire protection program audit frequencies.

During telephone conversations with NRC Staff on February 9 and February 16, 1995, we were advised that removal of the fire protection program audit frequencies is not supported by present NRC staff guidance. We were also advised that the supporting Safety Evaluation did not include justification for removing Technical Specification 15.7.8.2.C regarding distribution of radiological effluent technical specifications QA audit reports.

In response to your comments, we are modifying our request by withdrawing the proposed changes to Technical Specification 15.6.5.3, "Fire Protection Audits." Upon consideration of your request regarding the removal of Specification 15.7.8.2.C, we decided that the requirements for distribution of radiological effluent technical specifications QA audit reports would be more easily maintained if contained in the Technical Specifications as currently written. Therefore, we are changing our original proposal by retaining existing Specification 15.7.8.2.C.

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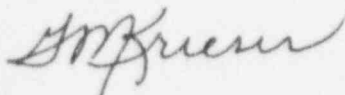
In addition, we have changed an incorrect reference in Specification 15.7.8.1, "Duties of the Manager's Supervisory Staff." This change corrects an inconsistency that was introduced with the issuance of Amendments 146 and 150 for PBNP Units 1 and 2 on January 27, 1994. We have also corrected the spelling of "licensee" in Specification 15.6.5.3(a). These are administrative changes only.

We have reviewed the No Significant Hazards Consideration forwarded to you in our January 24, 1995, submittal. Because the enclosed changes do not increase the scope or change the intent of the original submittal, we believe the conclusions contained therein remain valid. A revised Safety Evaluation discussing all proposed changes is enclosed. This Safety Evaluation continues to support our original conclusions that the proposed changes enhance the safe operation of PBNP.

Marked-up Technical Specifications pages affected by the above revisions are also enclosed.

Please contact us if you have any questions.

Sincerely,



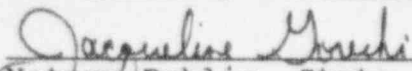
Bob Link  
Vice President  
Nuclear Power

DAW/jg

Enclosures

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

Subscribed and sworn before me on  
this 24<sup>th</sup> day of February 1995.



Notary Public, State of Wisconsin

My commission expires 10-27-96.

TECHNICAL SPECIFICATIONS CHANGE REQUEST 176  
(ATTACHED)

TECHNICAL SPECIFICATIONS CHANGE REQUEST 176  
REVISED SAFETY EVALUATION

INTRODUCTION

Wisconsin Electric Power Company (Licensee) is applying for amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. The proposed changes modify Sections 15.6.5, "Review and Audit," and 15.7.8, "Administrative Controls," by removing Quality Assurance (QA) audit frequency requirements. This proposal also removes Section 15.6.5.4, "Emergency Plan Reviews," and extends the radioactive effluent reporting period from semiannual to annual. Likewise, all references to "Semiannual Monitoring Report" are changed to "Annual Monitoring Report." Administrative changes are also being made to provide a correct reference in Specification 15.7.8.1 and correct a spelling error in Specification 15.6.5.3(a).

EVALUATION

This change does not impact the actual operation of the plant, and will result in an improvement in plant safety by allowing greater flexibility to schedule audits and assign resources based on the level of performance in the area being audited. The audit program would focus more on areas of weak performance, and less on consistently high performance areas. Audits required to be performed at frequencies specified by 10 CFR 50 and ANSI 18.7-1976 (as committed to in FSAR Section 1.8); however, will continue to be performed at the minimum specified frequencies. The purpose, scope, and thoroughness of the audits will not be affected. Management oversight of the audit process will not be diminished.

This proposal removes Technical Specifications Section 15.6.5.4, "Emergency Plan Reviews," due to redundant requirements specified in 10 CFR 50.54(t). Emergency Plan reviews will continue to be conducted in accordance with 10 CFR 50.54(t) as stated in Revision 5 of Point Beach Nuclear Plant Emergency Plan Maintenance Procedure (EPMP) 3.4, "Emergency Preparedness Program (EPP) Review."

On October 1, 1992, the radioactive effluent reporting requirement interval specified in 10 CFR 50.36a was increased from semiannual to annual (57 FR 39353, August 31, 1992). Therefore, this proposal changes our radioactive effluent reporting requirement from semiannual to annual in accordance with 10 CFR 50.36a. Likewise, all references to "Semiannual Monitoring Report" are changed to "Annual Monitoring Report."

These changes are consistent with NUREG-1431, "WOG Improved Standard Technical Specifications." No plant features provided to meet the design objectives of applicable General Design Criteria (GDCs) are affected by this proposal.

The administrative changes made to correct a misspelling and Specification reference do not alter the content or intent of any specifications.

#### CONCLUSION

In summary, the proposed revisions will enhance the effectiveness of our reporting, review, and audit programs, and enhance the safe and reliable operation of Point Beach Nuclear Plant.