



Wisconsin Electric POWER COMPANY
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February 7, 1984

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

Attention: Mr. J. R. Miller, Chief
Operating Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
MODIFICATION TO TECHNICAL SPECIFICATION CHANGE REQUEST NO. 94
CRITERIA FOR TYPE "A" INTEGRATED LEAK RATE TESTING
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated October 25, 1983 Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, submitted a license amendment application to incorporate changes into the Technical Specifications in order to meet the containment integrated leakage testing requirements of Appendix J to 10 CFR 50. Enclosed is a modification to that change request which revises some of these acceptance criteria for the duration of Type "A" integrated leakage rate tests (ILRT). The changes proposed herein stem from the differences in these EPRI project criteria between the draft report and the final publication version which was updated in the interim period between the respective issuance dates. These changes are considered minor clarifications but essential to the precision of these criteria and the accuracy of our Technical Specifications. Accordingly, these criteria from the final publication are substituted for those presented in the initial proposed Technical Specifications. Additionally, the justification/explanation relevant to this subject was removed from the previous proposed Technical Specification text bases and is presented as follows.

On February 1, 1973 the Atomic Energy Commission (AEC) approved the Bechtel Corporation Topical Report BN-TOP-1, entitled "Testing Criteria for Integrated Leakage Rate Testing of Primary

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Containment Structures for Nuclear Power". This report provides for test performance of less than 24 hours using the absolute method, total time technique. Since that time, no other technique has been "approved" even though a superior technique has been accepted for use by the NRC.

The absolute method, mass point technique is currently used at about 90% of the testing U. S. nuclear power plants. The rationale for this is that it is a statistically superior technique which yields a more representative result than the total time technique. This has been documented in various publications since the mid-1970's. It is the preferred technique of the ANS 56.8 Standard which is the most current industry document. Further, at the Scottsdale ANS R&D conference, Bechtel representatives concurred with the unanimous consensus (consisting of both industry and NRC attendees) that the mass point technique was the preferred technique.

A further refinement to the mass point technique was developed by Quadrex Corporation under EPRI Project 1393-5. EPRI Report NP-3400 published in December 1983 delineates these criteria for determining the duration of an ILRT. In the report, a base of 53 previously performed ILRT's was used to validate these criteria of which 47 ILRT's could have been successfully terminated prior to 24 hours using these criteria. To date, over 150 ILRT reports (about a 50% sample of all U. S. nuclear power plant ILRT's) have been used and these criteria have continued to be proven valid. The ANS 56.8 Working Group is currently reviewing this report in consideration of incorporating the report into a revision of the standard.

It is Licensee's desire to perform the ILRT in less than 24 hours using the preferred mass point technique with its most current validated refinement or the 1973 AEC approved Bechtel Topical Report (in keeping with the NRC's current position). The Technical Specifications, as proposed, would permit this option.

As stated in our October 25 submittal, these revisions to the Specifications have no safety or environmental significance which has not been previously considered and approved by the Commission staff. Accordingly, the pages submitted herein cancel and supersede those like numbered pages submitted with my October 25 letter.

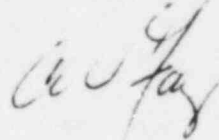
Mr. H. R. Denton

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Enclosed are three originals and forty copies of this modification to our license amendment request, including the proposed Technical Specification pages. Also enclosed are two copies of the referenced EPRI NP-3400 December report. Please contact us if you have any questions concerning this submittal.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Enclosures

Copies to NRC Resident Inspector
C. F. Riederer, PSCW

Subscribed and sworn to before me
this 7th day of February 1984.


Notary Public, State of Wisconsin

My Commission expires July 1, 1984.