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VPNPD-95-037
NRC-95-023

10 CFR 50.90
10 CFR 50.59

April 17, 1995

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

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATIONS CHANGE REQUEST 179
OPERATIONS MANAGER QUALIFICATIONS
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.59 and 10 CFR 50.90, Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, Units 1 and 2, hereby requests amendments to Licenses DPR-24 and DPR-27 respectively to implement changes to the Technical Specifications. The requested changes will update the qualification requirements for the Operations Manager to allow additional flexibility within the Operations organization while ensuring an equivalent qualification level of management oversight.

DESCRIPTION OF EXISTING SPECIFICATION

Technical Specification 15.6.2.2 requires the Operations Manager to hold an NRC Senior Operator (SRO) license. Specifications Section 15.6.2, "Facility Staff Qualifications," requires that facility staff meet or exceed the minimum qualification standards of ANSI N18.1-1971, except as modified in that section. ANSI N18.1-1971 requires the Operations Manager to hold an NRC SRO license at the time of appointment to the active position.

DESCRIPTION OF PROPOSED SPECIFICATION

We propose to delete the requirement in Specification 15.6.2.2 for the Operations Manager to hold an SRO license. We propose to replace this requirement with specific requirements in Specifications Section 15.6.3 for the Operations Manager to hold an SRO license, have held an SRO license at Point Beach Nuclear Plant or a similar facility, or be certified to an equivalent knowledge level. If the Operations Manager does not hold an SRO license, then an Operations middle manager shall hold an SRO license.

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These provisions are consistent with the qualification standards in ANSI/ANS 3.1-1987. These provisions provide added flexibility to our organization while ensuring that operating crew oversight is performed by an SRO licensed individual as provided in our present specifications. The revised Operations Manager qualification requirements meet equivalent knowledge standards without the added burden of maintaining an SRO license.

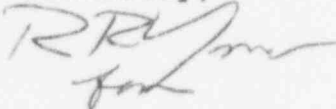
The Safety Evaluation and No Significant Hazards Consideration supporting these changes are attached. Marked-up Technical Specifications pages with the proposed changes are also included.

ENVIRONMENTAL CONSIDERATION

The proposed changes relate to changes in record keeping, reporting, or administrative procedures or requirements. Accordingly, the amendment meets the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(10). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the amendment.

If you have any questions or require additional information, please contact us.

Sincerely,



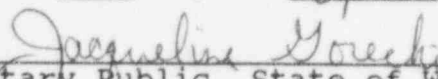
Bob Link
Vice President
Nuclear Power

TGM/jg

Attachments

cc: NRC Resident Inspector
NRC Regional Administrator
PSCW

Subscribed and sworn to before me
this 17th day of April, 1995.



Notary Public, State of Wisconsin
My Commission expires 10-27-96

SAFETY EVALUATION
TECHNICAL SPECIFICATIONS CHANGE REQUEST 179
OPERATIONS MANAGER QUALIFICATION REQUIREMENTS
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

The proposed amendments revise Technical Specifications (TS) 15.6.2.2, removing the requirement for the Operations Manager to hold an NRC Senior Reactor Operator license. It also modifies TS Section 15.6.3, "Facility Staff Qualifications," to require the Operations Manager to either hold or have held a Senior Reactor Operator (SRO) license at Point Beach Nuclear Plant (PBNP) or a similar unit, or have been certified to an equivalent SRO knowledge level at an appropriate simulator facility. If the Operations Manager does not hold an SRO license, then an operations middle manager (an assistant to whom the operating crews report) must hold an SRO license at PBNP. This change enhances the effective operation of PBNP by ensuring an appropriate level of qualification for operations management, while providing flexibility in the management organization assuring PBNP is operated safely and in accordance with NRC requirements.

The proposed changes would add new Specification 15.6.3.5 related to the qualification requirements for the position of Operations Manager and deletes Specification 15.6.2.2.g which requires the Operations Manager to hold an SRO license.

Technical Specification 15.6.3.1 requires members of the PBNP staff to meet or exceed the minimum qualifications of ANSI N18.1-1971, "American National Standard for Selection and Training of Nuclear Power Plant Personnel," as clarified further in the specifications. ANSI N18.1-1971 requires the Operations Manager to hold an SRO license at the time of appointment to the position. The proposed change would revise the Operations Manager qualification requirements from those listed in the standard as modified by Specification 15.2.2.g, to require that the Operations Manager hold or have previously held an SRO license for PBNP or a similar unit, or be certified to an equivalent level of knowledge. It also stipulates that if the Operations Manager does not hold an SRO, then a middle manager to whom the operating crews report shall hold an NRC SRO license.

ANSI/ANS 3.1-1987, which updated ANSI N18.1, introduced standards which further delineated the qualification requirements for operations management, allowing the Operations Manager to hold an SRO license, have held an SRO license for a similar unit, or be certified as qualified by use of other criteria. ANSI/ANS 3.1-1987 also states that if the Operations Manager does not hold an NRC license, then the operations middle manager shall hold an SRO license. The proposed specification meets this portion of the standard and, in addition, ensures that the operating crews will report to an NRC SRO licensed individual

which is equivalent to the requirement in present Specification 15.6.2.2.g. Therefore, the proposed change continues to meet acceptable qualification standards.

Section 50.54(1) of Title 10 of the Code of Federal Regulations states those individuals responsible for directing the licensed activities of licensed operators shall be licensed as senior operators. The proposed change, which provides additional flexibility, continues to meet this requirement by ensuring operations management maintains the appropriate qualification levels.

Since all regulatory requirements and acceptable standards continue to be met by the proposed specifications, as well as meeting the intent of existing Technical Specifications, we have concluded that there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, activities will be conducted in compliance with the Commission's regulations, and the issuance of the amendment will not be inimical to the common defense and security or to the health and safety of the public.

**NO SIGNIFICANT HAZARDS CONSIDERATION
TECHNICAL SPECIFICATIONS CHANGE REQUEST 179
OPERATIONS MANAGER QUALIFICATION REQUIREMENTS
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2**

The proposed amendment revises Technical Specification Sections 15.6.2 and 15.6.3 related to the qualification requirements for the position of Operations Manager. Technical Specification Section 15.6.3 currently requires members of the unit staff to meet or exceed the minimum qualifications of ANSI N18.1-1971, "American National Standard for Selection and Training of Nuclear Power Plant Personnel." Specification 15.6.2.2 modifies the requirements of ANSI N18.1 by requiring the Operations Manager to hold an NRC Senior Reactor Operator (SRO) license. The proposed change would revise the Operations Manager qualification requirements from those listed in the standard as modified by Specification 15.6.2, to requiring that the Operations Manager hold or have previously held an SRO license for PBNP or for a similar unit, or otherwise be certified at an equivalent knowledge level. If the Operations Manager does not hold an SRO license, then an operations middle manager shall hold an SRO license from the NRC. These requirements are consistent with ANSI/ANS 3.1-1987.

As required by 10 CFR 50.90, we have evaluated this proposed change against the standards in 10 CFR 50.91(a) and have determined that operation of the Point Beach Nuclear Plant, in accordance with the proposed amendments, does not involve a significant hazards consideration. Our analysis and basis for this conclusion follows:

The proposed change does not involve a significant increase in the probability or consequences of an accident previously evaluated; create the possibility of a new or different kind of accident from any previously evaluated; create the possibility of a new or different kind of accident from any previously evaluated.

The proposed change affects only an administrative control, which was based on industry guidance in ANSI N18.1-1971, that recommended the Operations Manager hold an SRO license. This administrative control is being updated to meet the current guidance in ANSI/ANS 3.1-1987.

The proposed qualification requirements for the Operations Manager ensures the individual filling the position meets knowledge levels equivalent to the present requirements. It also ensures that individuals responsible for directing the activities of licensed operators continue to hold SRO licenses as required by 10 CFR 50.54(1).

Since the proposed specifications ensure regulatory requirements are met and ensures knowledge levels equivalent to existing license requirements for operations management, the proposed changes are considered administrative. The design of plant systems and equipment is not being altered. Plant operations will continue to be directed and performed by qualified personnel. Therefore, the probability or consequences of accidents previously evaluated are not affected, a new or different type of accident is not created, nor is a margin of safety reduced.