



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

April 13, 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 OF TECHNICAL SPECIFICATION CHANGE REQUEST NO. 79
FIRE PROTECTION SYSTEMS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On April 19, 1983 Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, Units 1 and 2, submitted a license amendments application to incorporate revisions to the Technical Specifications addressing fire protection and detection systems. In a letter dated July 26, 1983 Mr. R. A. Clark responded to this request. He indicated that except for the relaxations requested in the application (fire watch inspection twice per shift vice once per hour and cold shutdown due to inoperable equipment from 30 to 48 hours) the remainder of the proposed specifications would be noticed in the Federal Register as involving no significant hazards consideration. This notice was subsequently published at 48 Federal Register 38430 on August 23, 1983.

Attached is a modification to the Technical Specifications proposed with our April 19 application. The primary purpose of these modifications is to address those relaxations effectively denied in Mr. Clark's letter dated July 26. You will note that we have revised the fire watch inspection frequency when certain fire protection systems are inoperable to once per hour. This is consistent with the Standard Technical Specifications and your previous directions. We have also deleted the specification which would require the reactors to be shut down in the event the fire main loop water supply is inoperable. This also is consistent with the standardized specifications in NUREG-0452.

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We have included the requirement that if operability of this system and the other systems described in Section 15.3.14 cannot be restored within a specified number of days, a special report will be submitted to the NRC in accordance with a new reportability paragraph added as Specification 15.6.9.3.G. This reportability is also consistent with NUREG-0452.

In addition to these changes to our previously proposed specifications, the following changes have been made:

1. A qualification has been added to 15.3.14 specifying that the provisions of 15.3.0 are not applicable. This is consistent with NUREG-0452.
2. The limiting conditions for operability have been qualified such that operability of the fire protection systems must exist whenever equipment protected by the systems is required to be operable.
3. Table 15.3.14-1 has been revised to define the safe shutdown areas, to acknowledge the availability of manual suppression fire hose stations in all areas, and to remove the numerical listing of fire detection devices.

Attached are proposed Technical Specification page changes. Specific changes on each page have been indicated with margin bars. For completeness we have enclosed copies of all changed pages, including those originally proposed with our April 19 application.

As required by 10 CFR 50.91(a)(1), we are providing the following discussion concerning the issue of whether the attached proposed changes do or do not involve a significant hazards consideration. As mentioned previously, the NRC notice published August 23 already proposed that the majority of these changes are not likely to involve a significant hazards consideration. Based on guidance provided by the Commission at 48 Federal Register 14870, we have determined that the specific new changes discussed in this modification to our application likewise do not involve a significant hazards consideration. This determination is based on the conclusion that although a change may result in some increase to the probability or consequence of an analyzed accident or may reduce a safety margin, if the results of the change are clearly within all acceptance criteria with respect to the system as

Mr. H. R. Denton

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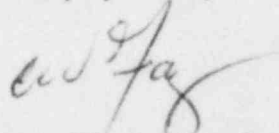
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specified in the Standard Review Plan, the change is not likely to involve a significant hazards consideration. For technical specifications the Standard Review Plan states that proposed technical specifications which are consistent with NUREG-0452, "Standard Technical Specification for Westinghouse Pressurized Water Reactors" are acceptable. Since the specification changes proposed in this application meet this acceptance criteria, we conclude that no significant hazards consideration is involved.

We have enclosed herewith three signed originals and forty copies of this modification to our license application concerning fire protection systems. Since not all the systems described in these proposed technical specifications are presently operable, specifically the Halon gaseous suppression system, we request you notify us prior to actual issuance of these amendments so that we may establish at that time a schedule for the effective dates of these specifications.

Please contact us if you have any questions concerning this application.

Very truly yours,



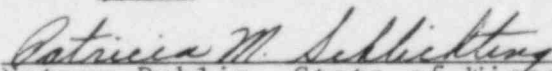
Vice President-Nuclear Power

C. W. Fay

Enclosures

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

Subscribed and sworn to before me
this 17th day of April, 1984.


Notary Public, State of Wisconsin

My Commission expires May 4, 1986.