



Wisconsin Electric POWER COMPANY
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April 18, 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

Mr. Miller's letter dated March 6, 1984 forwarded a number of comments on our application for license amendments dated October 25, 1983, as modified on February 7, 1984. This amendment request addressed revisions to the Point Beach Nuclear Plant Technical Specifications for reduced duration Type "A" integrated leakage rate testing.

The first comment concerned the apparent absence of a "significant hazards consideration" discussion in our February 7 modification. We believe that the 10 CFR 50.91(a)(1) determination provided with our October 25 letter is equally applicable to the revisions provided with our February 7 letter. A point-by-point comparison of the Specification 15.4.4.I.A.5.a items in our October 25 submittal to the same specification items in our February 7 submittal shows little difference except for the item on environmental stability which was replaced by a specification on contaminant modeling. This is in keeping with the final acceptance criteria listed on pages 5-1 and 5-2 of the referenced EPRI NP-3400 report. In addition, Specification 15.4.4.I.A.5.b was expanded in our February 7 submittal to include the BN-TOP-1 testing criterion as presented on pages 1-2 and 1-3 of the EPRI NP-3400 report.

In both these cases, the material added to the Technical Specifications represent additional limitations or controls not presently included in the specification. We note that the BN-TOP-1 criteria have previously been approved by the NRC. These changes are also submitted in response to

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Mr. H. R. Denton

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April 18, 1984

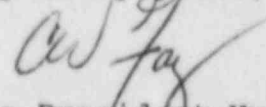
the NRC request for revisions which are necessary to ensure the specifications conform to the NRC regulations in 10 CFR 50 Apperdix J. The NRC has previously provided guidance in 48 Federal Register 14864 that changes of this nature are unlikely to involve a significant hazards consideration. For these reasons we had concluded in our October 25 letter that the changes involved no significant hazards consideration. The changes provided with our February 7 letter do not obviate any of these conclusions.

The second comment concerns the EPRI NP-3400 report submitted in support of the request. It was requested that at least 30 copies of this supporting report be submitted. We have previously forwarded to Mr. Colburn two copies of the report, in addition to the two copies provided with our February 7 letter. We are sending, under separate cover, an additional 26 copies of EPRI NP-3400 to satisfy your minimum requirements.

A final comment concerned a number of minor clerical and typographical errors in the submittal and one apparent substantive change. Specifically, you were concerned that proposed Specification 15.4.4.I.A.5.a(2) incorrectly stated that one rather than all the listed modeling conditions must be present. The specification as proposed is, we believe, correct. Your attention is invited to page 3-11 of the EPRI NP-3400 report which discusses this criterion. In order to correct the clerical errors your staff identified, we are providing herewith a complete package of revised proposed Technical Specification page changes. These pages supersede the proposed pages provided with our October 25, 1983 and February 7, 1984 letters.

As required by the Commission's regulations, we are enclosing three signed originals and forty copies of this modification to our license amendments application request. Please contact me if you have any additional questions concerning this request.

Very truly yours,



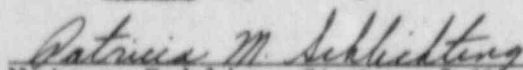
Vice President-Nuclear Power

C. W. Fay

Attachment

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

Subscribed and sworn to before me
this 23rd day of April 1984.


Notary Public, State of Wisconsin

My Commission expires May 4, 1986.