



Wisconsin Electric POWER COMPANY
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TLA006

March 16, 1984

CERTIFIED MAIL

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:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 88
HEAVY LOAD RESTRICTIONS, SAFETY-RELATED SNUBBERS,
AND MISCELLANEOUS ADMINISTRATIVE CHANGES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with Sections 50.59 and 50.90 of 10 CFR 50, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for the Point Beach Nuclear Plant, Units 1 and 2, respectively. The purpose of these amendments is to incorporate changes into the Point Beach Technical Specifications. The changes involve additional restrictions on heavy loads over the spent fuel pool, several additions and two deletions to the list of safety-related snubbers, changes to position titles within the administrative specifications, and miscellaneous editorial changes and corrections throughout the specifications. Specific changes requested in this application are discussed in this letter.

Specification 15.3.8.B, "Limitations on Load Movements Over Spent Fuel Pool", and the bases for this specification have been revised to prohibit the movement of heavy loads exceeding 1750 pounds over spent fuel stored in the spent fuel pool. This change was requested by the NRC in the Staff's Technical Evaluation Report on heavy load handling. We previously committed to include these limitations in our letter to you dated September 28, 1983.

Table 15.3.13-1, "Safety-Related Shock Suppressors", has been revised. For both Units 1 and 2 a number of new safety-related snubbers have been added to the listing. These snubbers

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were added as a result of our work on IE Bulletin 79-14 and our reanalysis of the pressurizer power-operated relief valve (PORV) and safety valve headers conducted in response to NUREG-0737, Item II.D.1. In addition to the listing of these new snubbers, we are also proposing to delete a snubber from each unit's listing, specifically 1-HS-M74 (Unit 1) and 2-HS-M75 (Unit 2). As a result of the redesign of the pressurizer PORV and safety valve headers and the addition of new supports, hangers, and snubbers, these specific snubbers no longer provide any restraint or support function and may be removed.

A number of changes have been proposed to Section 15.6, "Administrative Controls". These changes are detailed as follows:

1. The title of the plant manager has been changed from Manager-Nuclear Operations to Manager-Point Beach Nuclear Plant.
2. The title of Director-Nuclear Power Department has been changed to Vice President-Nuclear Power.
3. The Manager-Nuclear Engineering Section has been replaced by two section General Superintendents.
4. The Shift Supervisor is now a Shift Superintendent.
5. The description of the Duty and Call Superintendent has been moved from Section 15.6.5 to the more appropriate Section 15.6.2.
6. Figures 15.6.2-1 through 15.6.2-4 have been revised to reflect the new position titles. Figure 15.6.2-2 has been revised to include the new minimum shift staffing requirements of 10 CFR 50.54m. Figure 15.6.2-4 is also revised to comply with the Point Beach fire protection organization which no longer relies on contract security guards for the fire brigade.
7. The description of the duties and responsibilities of the Manager's Supervisory Staff (MSS) in Specification 15.6.9.1 has been editorially revised to clarify and simplify the specifications. The requirement for the MSS to review plant operations for industrial safety has been deleted from the Technical Specifications. Although such reviews are conducted by Wisconsin Electric through appropriate audit and review authorities, such reviews should not require Technical Specification documentation.

8. Requirements for Emergency Plan drills are now specified in the Emergency Plan and should be deleted from the specifications. An audit of the Emergency Plan is required by Specification 15.6.5.5 to ensure that plan requirements are being followed.
9. Specification 15.6.3.2 has been revised to provide flexibility in assignment of the Radiation Protection Manager position to the Health Physicist or a designated alternate. The requirements and qualifications for this position have not changed.
10. Specification 15.6.8.3 has been revised to simplify and clarify the description of temporary procedure change approvals.

The remainder of the proposed revisions included with the attached page changes to the Technical Specifications involve clerical, editorial, or typographical corrections. Specific changes on each page are identified by margin bars. In several cases these changes consisted of correcting the specification terminology to a format recognized in the Technical Specification definitions.

As required by 10 CFR 50.91(a)(1), we are providing the following discussion concerning the issue of whether or not these proposed changes involve any significant hazards consideration using the standards and criteria specified in 10 CFR 50.92. The Nuclear Regulatory Commission has provided guidelines concerning the application of these standards in the Statement of Consideration published with the rule at 48 Federal Register 14870. That reference considers purely administrative changes to the specifications, for example, changes to achieve consistency, correction of error, or a change in nomenclature, as examples of amendments that are not likely to involve a significant hazards consideration. With the exception of the changes to Specifications 15.3.8 and 15.3.13 discussed above, the attached changes are exactly of this type. The change to Figure 15.6.2-2 also involves a revision to make the license conditions conform to changes in the regulations, which is another example of an amendment unlikely to involve a significant hazards consideration.

The changes to Specification 15.3.8 constitute additional limitations not presently included in the Technical Specifications. This is a third example from 48 Federal Register 14870 of changes not likely to involve significant hazards consideration. Although the additions to Table 15.3.13-1 constitute

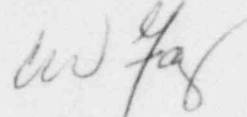
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additional limitations, we have also requested to delete one snubber from each unit's list. We have performed pipe stress analyses which demonstrate that the piping stresses for the new pipe support configuration are less than the stresses calculated, assuming the same transient conditions, for the original pipe support configuration. Accordingly, we can conclude that there is a decrease in the probability of an accident and an increase in the margin of safety. Upgrading the pipe supports cannot create the possibility of a new or different kind of accident from those previously analyzed; therefore, by the criteria of 10 CFR 50.92, there is no significant hazards consideration involved with this change.

In accordance with the schedule of fees for reactor facility license amendments, as specified in 10 CFR 170.22, we have enclosed a check in the amount of \$1,600 for the applicable approval fee. This amount consists of \$1,200 for a Class II approval for the Unit 1 license and \$400 for a Class I, or duplicate, approval for the Unit 2 license. The Class II determination is based on the administrative nature of the majority of these changes and the conclusion that additional restrictions in Specification 15.3.8 and the changes to Table 15.3.13-1 are revisions which have no safety or environmental significance.

We enclose herewith three signed originals and, under separate cover, forty copies of this license amendment application and attached proposed Technical Specification pages. Please contact us if you have any questions concerning these proposed changes or questions regarding the bases for our no significant hazards consideration and fee determinations.

Very truly yours,



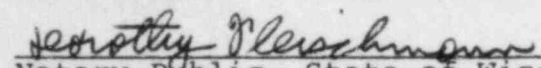
Vice President-Nuclear Power

C. W. Fay

Enclosures (Check No. 775921)

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

Subscribed and sworn to before me
this 16th day of March 1984.


Notary Public, State of Wisconsin

My Commission expires July 1, 1984.