



**Wisconsin Electric** POWER COMPANY  
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March 19, 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:

DOCKETS 50-266 AND 50-301  
TECHNICAL SPECIFICATION TO LIMIT OVERTIME  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In your amendment approval letter dated December 28, 1983, you reiterated the request transmitted by NRC Generic Letter 82-16 dated September 20, 1982 that Wisconsin Electric Power Company propose an addition to the Point Beach Nuclear Plant Technical Specifications which would limit the amount of overtime worked by plant staff members performing safety-related functions in accordance with the NRC Policy Statement on working hours. As you know, we noted in our response to Generic Letter 82-16 dated December 15, 1982 that these restrictions are presently addressed by administrative procedures. Mr. R. A. Clark's letter dated December 2, 1981 had acknowledged that these plant procedures adequately address the overtime guidance. Our procedures were subsequently revised to comply with the changes in this guidance as promulgated in NRC Generic Letter 82-12 dated June 15, 1982. We are, in summary, in agreement with the NRC Policy Statement and guidance concerning staff overtime and working hours.

Notwithstanding our conformance with this policy, we believe that this topic is not an appropriate item for documentation in the plant Technical Specifications. The Commission has published a proposed rule concerning technical specifications for nuclear power reactors in 47 Federal Register 13369. This proposed rule was prompted by the increased volume and detail of technical specifications and is an attempt to reduce the resultant paperwork burden for both licensees and the NRC staff due to the large number

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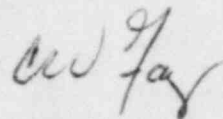
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of proposed change requests that must be processed. With the proposed rule, the NRC would modify the categories of required specifications to those items which focus directly on the aspects of reactor operation that are important to the public health and safety and would define a new category of requirements that would be of lesser immediate importance to safety than technical specifications. This would permit greater flexibility to both the NRC and licensees in processing changes to this latter category of requirements. We believe the policy on limiting staff overtime would properly be placed in this latter category of issues with lesser immediate importance to safety and is not appropriate for inclusion in plant technical specifications. Although the NRC has not, as yet, acted on this proposed rule, we believe it is appropriate to consider this request for an overtime technical specification in light of this proposed rule.

Licensees are already required by their technical specifications to operate their nuclear plants in accordance with approved procedures. Should a licensee schedule overtime hours contrary to approved procedures, the NRC, including the Resident Inspectors, already have adequate authority and precedent to enforce this overtime policy.

In light of the pending Commission position on technical specifications and our conformance with the overtime policy statement in our plant procedures, we propose to delay amending our operating licenses and revising our technical specifications in anticipation of the adoption of the Commission's proposed rule on technical specification content.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector