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10CFR50.90

January 21, 1997

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US NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATIONS CHANGE REQUEST 195
RADIATION PROTECTION PROGRAM
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 50.90, Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant Units 1 and 2, hereby requests amendments to DPR-24 and DPR-27, respectively. The requested amendments update references to 10 CFR 20 in Technical Specifications Section 15.6.11, "Radiation Protection Program." A safety evaluation, determination of no significant hazards, and marked-up Technical Specifications pages indicating the proposed changes are attached.

DESCRIPTION OF CURRENT LICENSE CONDITION

Technical Specifications Section 15.6.11, "Radiation Protection Program," specifies the radiation protection program requirements and alternative control measures for high radiation areas.

DESCRIPTION OF PROPOSED CHANGES

The proposed changes update all references to 10 CFR 20, "Standard for Protection Against Radiation," contained in Technical Specifications Section 15.6.11, "Radiation Protection Program." Specifically:

1. All references to 10 CFR 20, Paragraph 20.203, "Caution signs, signals, labels and controls," are modified to reference the applicable portions of Paragraph 20.1601, "Control of Access to High Radiation Areas."
2. The footnote designated "*" is modified to indicate the dose rates are at no more than 30 centimeters from the source of the radioactivity. This meets the requirements of 10 CFR 20.1601(a)(1)

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BASIS AND JUSTIFICATION

The proposed changes restore consistency between the PBNP license and the regulations contained in 10 CFR 20. Wisconsin Electric implemented the requirements of the modified 10 CFR 20 on January 1, 1993. This change is administrative only; restoring consistency between the PBNP license and the regulations.

We have determined that the proposed amendments do not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in individual or cumulative occupational radiation exposure. Therefore, we conclude that the proposed amendments meet the categorical exclusion requirements of 10 CFR 50.22 (c) (9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

In summary, the proposed amendments are administrative only providing consistency between the regulations and Point Beach licenses. Please contact us if you have any questions or require additional information.

Sincerely,




Gary M. Krieser
Manager - Strategic Issues

TGM

Enclosures

cc: NRC Regional Administrator
NRC Resident Inspector
Wisconsin Public Service Commission

Subscribed and sworn before me on
this 21st day of January 1997.



Notary Public, State of Wisconsin

My commission expires 10/24/2000.

Safety Evaluation
Technical Specifications Change Request 195
Radiation Protection Program
Point Beach Nuclear Plant, Units 1 and 2

Wisconsin Electric Power Company (licensee) is applying for amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2, respectively. The amendments propose to modify Technical Specifications Section 15.6.11, "Radiation Protection Program," to provide the correct references to 10 CFR 20.

10 CFR 20 was changed, and the changes implemented at the Point Beach Nuclear Plant on January 1, 1993. As a result of these changes, references to 10 CFR 20 in the Point Beach Nuclear Plant Technical Specifications are no longer current. The changes made to reflect the correct paragraphs of 10 CFR 20 are therefore administrative only since the purpose is to restore consistency between the Technical Specifications and the regulations.

Technical Specification 15.6.11 also provides approved alternate measures that may be used for the control of high radiation areas. These alternate measures continue to be acceptable in accordance with the provisions of 10 CFR 20.1601 (c). In addition, as reflected in the changes to the Specification footnote designated "*", 10 CFR 20 specifies the dose at 30 centimeters from the source of radiation. This is more restrictive than the 18 inches presently reflected in the footnote and results in additional area being designated as high radiation areas. The net effect of these changes provides an increased margin of safety for personnel at the Point Beach Nuclear Plant.

In conclusion, the proposed amendments are administrative only in that they provide for consistency between the PBNP licenses and Commission regulations. The proposed amendments also provide for more conservative determinations of high radiation areas. These changes therefore, provide additional assurance of continued safe operation of the facility in accordance with Commission regulations.

**No Significant Hazards Determination
Technical Specifications Change Requests 195
Radiation Protection Program
Point Beach Nuclear Plant, Units 1 and 2**

In accordance with the requirements of 10 CFR 50.91 (a), Wisconsin Electric Power Company (licensee), has evaluated the proposed amendments against the standards in 10 CFR 50.92 and has determined that the operation of Point Beach Nuclear Plant in accordance with the proposed amendments, does not result in a significant hazards consideration. The evaluation against each of the standards and basis for this conclusion is provided below:

1. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not create a significant increase in the probability or consequences of an accident previously evaluated.

The proposed amendments are administrative in nature, providing consistency between the Point Beach licenses and Commission regulations. The amendments do not affect the operation or maintenance of any PBNP structure system or component. In addition, the regulations and proposed changes provide more conservative determinations of high radiation areas, thereby potentially resulting in lower personnel radiation exposures during normal operation and post accident. The consequences of an accident related to personnel radiation exposures may be reduced.

2. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not create the possibility of a new or different kind of accident from any accident previously evaluated.

The proposed amendments are administrative only and do not affect the operation or maintenance of any structure system or component at Point Beach Nuclear Plant. No new systems or components are introduced. Therefore, no new accident initiators or sequences result from any previously evaluated.

3. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not create a significant reduction in a margin of safety.

The proposed amendments are administrative and reflect regulatory requirements that are more conservative than those presently reflected in the PBNP Technical Specifications. These more conservative requirements result in more conservative designation of high radiation areas thereby providing additional margins of safety related to the control of radiation exposures to personnel. No structure system or component at PBNP is changed thereby maintaining the margins of safety for the operation of the Point Beach Nuclear Plant.

In conclusion, the proposed amendments are administrative only, providing consistency between the Commission's regulations and the PBNP licenses. The proposed amendments also reflect the present, more conservative requirements for the designation of high radiation areas than those presently reflected in the PBNP Technical Specifications. The proposed amendments reflect enhanced controls in use at PBNP and results in a determination of no significant hazards.