



UNITED STATES
NUCLEAR REGULATORY COMMISSION

WASHINGTON, D.C. 20555-0001

August 15, 2000

Mr. Michael B. Sellman, President
Nuclear Management Company, LLC
700 First Street
Hudson, WI 54016

SUBJECT: POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2 - ISSUANCE OF
AMENDMENTS RE: CONTROL ROOM HABITABILITY (TAC NOS. MA9042 AND
MA9043)

Dear Mr. Sellman:

The Commission has issued the enclosed Amendment No. 198 to Facility Operating License No. DPR-24 and Amendment No. 203 to Facility Operating License No. DPR-27 for the Point Beach Nuclear Plant, Units 1 and 2, respectively. The amendments consist of changes to the Operating Licenses in response to your application dated May 19, 2000, as supplemented August 3, 2000.

These amendments eliminate one of the license conditions and associated implementation dates from Appendix C to the licenses. The license condition required the licensee to submit a license amendment application and supporting radiological dose analyses demonstrating compliance with General Design Criterion 19 dose limits without reliance on potassium iodide (KI). By letter dated April 7, 2000, the NRC staff accepted the licensee's assertion that the use of KI to reduce operator dose during a radiological emergency was not precluded in the licensing basis for Point Beach, Units 1 and 2.

A copy of our related safety evaluation is also enclosed. The Notice of Issuance will be included in the Commission's biweekly *Federal Register* notice.

Sincerely,

Beth A. Wetzel, Senior Project Manager, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Docket Nos. 50-266 and 50-301

Enclosures: 1. Amendment No. 198 to DPR-24
2. Amendment No. 203 to DPR-27
3. Safety Evaluation

cc w/encls: See next page

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/RA/

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cc w/encls: See next page

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PUBLIC	OGC
PDIII-1 Reading	ACRS
CCraig	WBeckner
BWetzel	GHill(4)
RBouling	RLanksbury, RGN-III

*previous concurrence

OFFICE	PDIII-1/PM	PDIII-1/LA	SPSB/BC *	OGC *	PDIII-1/SC
NAME	BWetzel <i>BW</i>	RBouling <i>RB</i>	RBarrett	JMoore	CCraig <i>CC</i>
DATE	8/15/00	8/15/00	08/10/00	08/14/00	8/15/00

DOCUMENT NAME: G:\PDIII-1\PTBEACH\AMDa9042.wpd
OFFICIAL RECORD COPY

Point Beach Nuclear Plant, Units 1 and 2

cc:

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November 1999



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

WISCONSIN ELECTRIC POWER COMPANY

DOCKET NO. 50-266

POINT BEACH NUCLEAR PLANT, UNIT 1

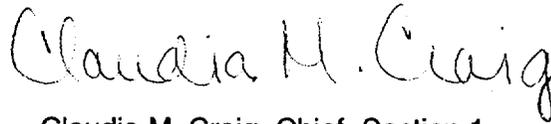
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 198
License No. DPR-24

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Wisconsin Electric Power Company (the licensee) dated May 19, 2000, as supplemented August 3, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. The Operating License is amended as indicated in the attachment to this license amendment.
3. This license amendment is effective as of the date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

Handwritten signature of Claudia M. Craig in cursive script.

Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Operating License

Date of issuance: August 15, 2000



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

WISCONSIN ELECTRIC POWER COMPANY

DOCKET NO. 50-301

POINT BEACH NUCLEAR PLANT, UNIT 2

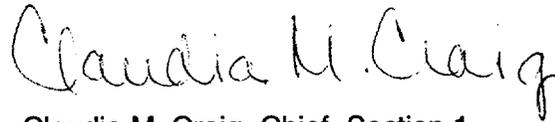
AMENDMENT TO FACILITY OPERATING LICENSE

Amendment No. 203
License No. DPR-27

1. The Nuclear Regulatory Commission (the Commission) has found that:
 - A. The application for amendment by Wisconsin Electric Power Company (the licensee) dated May 19, 2000, as supplemented August 3, 2000, complies with the standards and requirements of the Atomic Energy Act of 1954, as amended (the Act), and the Commission's rules and regulations set forth in 10 CFR Chapter I;
 - B. The facility will operate in conformity with the application, the provisions of the Act, and the rules and regulations of the Commission;
 - C. There is reasonable assurance (i) that the activities authorized by this amendment can be conducted without endangering the health and safety of the public, and (ii) that such activities will be conducted in compliance with the Commission's regulations;
 - D. The issuance of this amendment will not be inimical to the common defense and security or to the health and safety of the public; and
 - E. The issuance of this amendment is in accordance with 10 CFR Part 51 of the Commission's regulations and all applicable requirements have been satisfied.

2. The Operating License is amended as indicated in the attachment to this license amendment.
3. This license amendment is effective as of its date of issuance and shall be implemented within 30 days.

FOR THE NUCLEAR REGULATORY COMMISSION

A handwritten signature in black ink that reads "Claudia M. Craig". The signature is written in a cursive, flowing style.

Claudia M. Craig, Chief, Section 1
Project Directorate III
Division of Licensing Project Management
Office of Nuclear Reactor Regulation

Attachment: Changes to the Operating License

Date of issuance: August 15, 2000

ATTACHMENT TO LICENSE AMENDMENT NO. 198

TO FACILITY OPERATING LICENSE NO. DPR-24

AND LICENSE AMENDMENT NO. 203

TO FACILITY OPERATING LICENSE NO. DPR-27

DOCKET NOS. 50-266 AND 50-301

Replace the following pages of Appendix C of the Operating Licenses with the attached revised pages. The revised pages are identified by amendment number and contain marginal lines indicating the areas of change.

REMOVE

C-1 (DPR-24)

C-1 (DPR-27)

INSERT

C-1 (DPR-24)

C-1 (DPR-27)

APPENDIX C
ADDITIONAL CONDITIONS
OPERATING LICENSE DPR-24

Nuclear Management Company, LLC shall comply with the following conditions and the schedules noted below:

<u>Amendment Number</u>	<u>Additional Conditions</u>	<u>Implementation Date</u>
-----------------------------	------------------------------	--------------------------------

174	Deleted	
-----	---------	--

174	<p>This amendment is authorized contingent on compliance with commitments provided by the licensee to operate Point Beach Nuclear Plant in accordance with its service water system analyses and approved procedures. Specifically, each unit will utilize only one component cooling water heat exchanger until such time as analyses are completed and the service water system reconfigured as necessary to allow operation of one or both units with two heat exchangers in service. If two component cooling water heat exchangers are required in one or both units for maintaining acceptable component cooling water temperature prior to completion of necessary analyses to allow operation in the required configuration, the service water system will be considered in an unanalyzed condition, declared inoperable, and action taken as specified by TS 15.3.0.B except for short periods of time as necessary to effect procedurally controlled changes in system lineups and unit operating conditions.</p>	Immediately
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APPENDIX C
ADDITIONAL CONDITIONS
OPERATING LICENSE NO. DPR-27

Nuclear Management Company, LLC shall comply with the following conditions and the schedules noted below:

<u>Amendment Number</u>	<u>Additional Conditions</u>	<u>Implementation Date</u>
-----------------------------	------------------------------	--------------------------------

178	Deleted	
-----	---------	--

178	<p>This amendment is authorized contingent on compliance with commitments provided by the licensee to operate Point Beach Nuclear Plant in accordance with its service water system analyses and approved procedures. Specifically, each unit will utilize only one component cooling water heat exchanger until such time as analyses are completed and the service water system reconfigured as necessary to allow operation of one or both units with two heat exchangers in service. If two component cooling water heat exchangers are required in one or both units for maintaining acceptable component cooling water temperature prior to completion of necessary analyses to allow operation in the required configuration, the service water system will be considered in an unanalyzed condition, declared inoperable, and action taken as specified by TS 15.3.0.B except for short periods of time as necessary to effect procedurally controlled changes in system lineups and unit operating conditions.</p>	Immediately
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UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555-0001

SAFETY EVALUATION BY THE OFFICE OF NUCLEAR REACTOR REGULATION

RELATED TO AMENDMENT NO. 198 TO FACILITY OPERATING LICENSE NO. DPR-24

AND AMENDMENT NO. 203 TO FACILITY OPERATING LICENSE NO. DPR-27

WISCONSIN ELECTRIC POWER COMPANY

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

DOCKET NOS. 50-266 AND 50-301

1.0 INTRODUCTION

By application dated May 19, 2000, as supplemented August 3, 2000, the Wisconsin Electric Power Company (WE or the licensee) requested changes to Facility Operating License Nos. DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP), Units 1 and 2, respectively. The proposed changes would eliminate one of the license conditions and associated implementation dates from Appendix C to the licenses. The license condition currently requires the licensee to submit a license amendment application and supporting radiological dose analyses demonstrating compliance with General Design Criterion (GDC) 19 dose limits without reliance on potassium iodide (KI).

The August 3, 2000, supplemental letter provided clarifying information that was within the scope of the original application and did not change the staff's initial proposed no significant hazards consideration determination.

2.0 BACKGROUND

On July 9, 1997, the NRC issued Amendment Nos. 174 and 178 to the Operating Licenses for PBNP, Units 1 and 2, respectively. Included with these amendments was the addition of Appendix C, "Additional Conditions," to the licenses. Appendix C contains two license conditions based on commitments made by WE in response to issues addressed during the NRC staff's review of Amendment Nos. 174 and 178.

One of the license conditions requires the licensee to submit an amendment application including supporting analyses and evaluations by February 27, 1998, that contains the proposed methods for compliance with GDC 19 dose limits under accident conditions based on system design and without reliance on KI and/or supplied air breathing apparatus. Further, the licensee is to implement the proposed changes within 2 years of the date that NRC approval for the proposed license amendment is granted.

The licensee submitted an application for amendments, dated February 26, 1998, per the license condition. The amendment request included a control room dose analysis without the use of KI and supplied air breathing apparatus. The staff began its review of the February 26, 1998, amendment request, which included issuance of various requests for additional information.

At a meeting between the staff and the licensee on July 20, 1999, licensee personnel discussed their interest in withdrawing the February 26, 1998, application because of their estimate of high costs of the modifications associated with the amendment and the licensee's belief that little safety benefit would be gained by implementing the amendment. Also, the licensee contended that the proposed amendments required by the license condition were inconsistent with the current and historical licensing basis for PBNP. The licensee representatives stated that if they withdraw the amendment request, it would be their intention to rely permanently on KI tablets to lower the thyroid dose to control room operators following a loss-of-coolant accident (LOCA). The licensee stated that reliance on KI has always been part of its licensing basis. This meeting was documented in a meeting summary dated September 8, 1999.

3.0 EVALUATION

As a result of deletion of the license condition, the licensee would rely on KI tablets to lower the thyroid dose to control room operators in their control room dose analysis for a LOCA. The use of KI tablets reduces the dose to the thyroid by a factor of 10. Without reliance on KI tablets, the licensee would require significant modifications to the control room ventilation system in order to meet the GDC 19 dose limits.

In a letter to WE dated April 7, 2000, the staff stated, "...the staff accepts your assertions and supporting evidence that control room operator use of KI tablets in a radiological emergency was not precluded in the original licensing basis for PBNP, Units 1 and 2." PBNP's licensing basis for control room dose analyses is based on NUREG 0737, item III.D.3.4, "Control Room Habitability," which states that licensees shall assure that control room operators will be adequately protected against the effects of accidental release of toxic and radioactive gases and that the nuclear power plant can be safely operated or shut down under design-basis accident conditions (DBAs) (Criterion 19, "Control Room," of Appendix A, "General Design Criteria for Nuclear Power Plants," to 10 CFR Part 50).

The NRC issued a letter dated August 10, 1982, closing NUREG 0737, item III.D.3.4, for PBNP, Units 1 and 2. The safety evaluation enclosed with that letter stated that the licensee's doses met the requirements of 10 CFR Part 50 and the licensee is crediting KI. Further, the licensee also stated that they were relying on KI in other letters to the NRC dated February 23, 1981, and September 4, 1984.

The licensee submitted analyses and assumptions for radiological consequences for the control room in support of its application for Amendment Nos. 174 and 178. The licensee stated in its application that calculated doses are below the accepted criteria presented in 10 CFR Part 100. The licensee's calculated doses are below the dose limits presented in GDC 19 for all the DBAs analyzed provided that KI tablets are used by control room operators in the event of a large-break LOCA, control-rod-ejection accident, and locked-rotor accident. The licensee's calculations confirm that the LOCA doses are greater than the doses associated with the other evaluated DBAs. Based on the staff's review and the licensee's decision to provide additional

assurance above those required by the Technical Specifications (TSs), the staff concluded that there is reasonable assurance that the dose limits presented in 10 CFR Part 100 and GDC 19 would not be exceeded.

In a letter dated February 24, 1999, the licensee notified the staff of a commitment change with respect to the additional assurances associated with Amendment Nos. 174 and 178. WE evaluated the commitment change in accordance with the applicable plant procedure which incorporates Nuclear Energy Institute's (NEI's) "Guidelines for Managing NRC Commitments," Revision 2, dated December 19, 1995, and concluded that the change was acceptable. The NRC has endorsed the NEI guidance for commitment changes.

During a teleconference between the licensee and the staff on August 1, 2000, the staff requested that the licensee provide additional information regarding the discontinuation of the commitments or additional assurances relied upon in Amendment Nos. 174 and 178. The licensee provided this additional information in a letter dated August 3, 2000. In that letter, the licensee provided details for each of the six additional assurances. Although the additional assurances are no longer tracked as commitments, some of them continue to be implemented as part of the licensee's procedures or Technical Specifications. For those that are no longer being implemented, the licensee concluded that there was no net benefit to safety by performing the commitment.

During the teleconference on August 1, 2000, the staff also requested specifics from the licensee regarding the circumstances that would necessitate the use of KI at PBNP. In its letter dated August 3, 2000, the licensee provided details of the procedures for using KI during an accident. Point Beach Emergency Implementing Procedures direct the use of KI based on dose projections. Therefore, operators would be directed to use KI tablets in the event of any accident where dose projections would warrant their use.

The licensee has also added an additional administrative limit by reducing its containment leakage rate limit to .2La, which is below the TS-required limit of .4La. The licensee states in its August 3, 2000, letter that this overall reduction in allowed containment leakage, in conjunction with the TS-required surveillances, provides adequate assurance that operator dose will remain within GDC 19 dose limits based on the assumptions in the dose analysis of record. Therefore, the licensee concludes the intent of the original commitments continue to be met.

In a letter dated April 7, 2000, the staff stated its understanding that WE will submit a separate amendment request containing a revised dose analysis for the staff to review by May 1, 2001. The licensee stated in its May 19, 2000, submittal, "We reaffirm our commitment, included in the staff's April 7, 2000 letter, to revise and submit radiological dose analyses for the control room and a license amendment proposal as necessary to demonstrate continued conformance to the regulatory requirements and the PBNP licensing basis, in accordance with the specified timeline."

3.1 Conclusion

The use of KI tablets for control room operators during an emergency had previously been in the licensing basis for PBNP. Also, as mentioned above, the staff reviewed the licensee's current licensing basis analysis for radiological consequences for the control room as part of its review of Amendment Nos. 174 and 178. After review of these amendments, the staff

concluded that there was reasonable assurance that the dose limits presented in 10 CFR Part 100 and GDC 19 would not be exceeded.

Based on the above, the staff finds the proposed amendments withdrawing the current license conditions acceptable.

4.0 STATE CONSULTATION

In accordance with the Commission's regulations, the Wisconsin State official was notified of the proposed issuance of the amendments. The State official had no comments.

4.0 ENVIRONMENTAL CONSIDERATION

These amendments change a requirement with respect to the installation or use of a facility component located within the restricted area as defined in 10 CFR Part 20 or change a surveillance requirement. The staff has determined that the amendments involve no significant increase in the amounts and no significant change in the types of any effluent that may be released offsite, and that there is no significant increase in individual or cumulative occupational radiation exposure. The Commission has previously published a proposed finding that these amendments involve no significant hazards consideration and there has been no public comment on such finding (65 FR 35966). Accordingly, these amendments meet the eligibility criteria for categorical exclusion set forth in 10 CFR 51.22(c)(9). Pursuant to 10 CFR 51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of these amendments.

5.0 CONCLUSION

The Commission has concluded, based on the considerations discussed above, that (1) there is reasonable assurance that the health and safety of the public will not be endangered by operation in the proposed manner, (2) such activities will be conducted in compliance with the Commission's regulations, and (3) the issuance of the amendments will not be inimical to the common defense and security or to the health and safety of the public.

Principal Contributor: B. Wetzel

Date: August 15, 2000