



**Wisconsin Electric** POWER COMPANY  
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

September 19, 1980

CERTIFIED MAIL

Mr. H. R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. NUCLEAR REGULATORY COMMISSION  
Washington, D. C. 20555

Dear Mr. Denton:

DOCKET NOS. 50-266 AND 50-301  
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 64  
LIMITING CONDITIONS FOR OPERABILITY  
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In accordance with Part 50.59 of Title 10 of the Code of Federal Regulations, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 to incorporate the following changes and additions to the Technical Specifications for the Point Beach Nuclear Plant, Units 1 and 2. These changes were requested by the Nuclear Regulatory Commission in Mr. Darrell G. Eisenhut's letter to All Power Reactor Licensees dated April 10, 1980.

The attached proposed Technical Specification pages consist of a revised definition of operability and several new specifications addressing the limiting conditions for operations. As discussed in Mr. Eisenhut's letter, these specifications require corrective action or plant shut-down if circumstances in excess of those permitted by the limiting conditions for operation should occur. As discussed in our letter dated May 16, 1980, our policy and practice of operation of the Point Beach Nuclear Plant have always been in accordance with the intent of these specifications. We have modified the terminology utilized in your model specification to conform with our present specifications. We have also specified that when it becomes necessary to shut down the plant, three hours rather than one hour be permitted to get to the hot shut-down condition. This provides for a more appropriate ramping down in power of the unit for turbine operability considerations. Of course,

September 19, 1980

if the specific conditions requiring shut-down involved significant safety-related equipment which was seriously degraded, this shut-down could be accomplished more rapidly, including, if necessary, an immediate reactor shut-down.

These specifications also address inoperability of safety-related systems solely due to failure of their emergency or normal power supplies. Again we have modified the NRC standard specifications to conform with the Point Beach Technical Specification format.

We have included a specification addressing the momentary loss of normal or emergency power which results in immediate corrective action in accordance with Table 15.3.5-2, "Instrument Operation Conditions for Reactor Trip". This specification provides that such an occurrence shall not be interpreted as causing a violation of the specifications concerning minimum operable channels and minimum degree of redundancy as presented in Table 15.3.5-2. The lack of this specification has resulted in many interpretation disputes in the past and would serve to clarify the intent of the Table 15.3.5-2 instrumentation specifications.

We are also taking the opportunity of this license amendments application to request two administrative changes to the Point Beach Nuclear Plant Technical Specifications. The first involves the composition of the Manager's Supervisory Staff as specified in Item 15.6.5.2.2. We propose that the Reactor Engineer be added to the list of members. The second change concerns Specification 15.6.11, "Radiation Protection Program". During an NRC inspection, it was suggested that this specification could be changed to provide more flexibility for exercising positive control over individuals entering or working in areas where radiation levels are greater than 100 mRem/hr, but less than 1000 mRem/hr. Licensee's review of the NRC Standardized Technical Specifications revealed that other options are available which provide appropriate administrative controls. These options have been adopted into the revised Specification 15.6.11, submitted.

Licensee has reviewed the requirements of 10 CFR Section 170.22 regarding the schedule of fees for facility license amendment approvals. It is our determination that this application is subject to one Class III fee, for the LCO's requested by the Commission as modified by the Licensee; one Class II fee, for the administrative changes discussed above; and one Class I fee, since this license amendments application is for two essentially identical units and is submitted as one request. Accordingly, we are providing herewith a check for the total amendment approval fees of \$5,600.

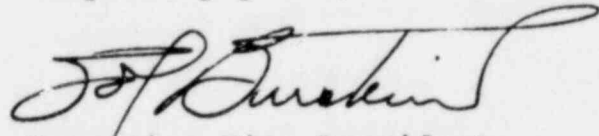
Mr. H. R. Denton

-3-

September 19, 1980

As specified in the regulation, we have enclosed three signed originals and forty copies of this amendments application. Please contact us if you have any questions regarding this submittal.

Very truly yours,



Executive Vice President

Sol Burstein

Attachments (Check No. 512999)

Copy to NRC Resident Inspector  
Point Beach Nuclear Plant

Subscribed and sworn to before me  
this 19th day of September, 1980.

*Sonstey Gleischnann*  
Notary Public, State of Wisconsin

My Commission expires July 1, 1984.