

September 15, 1980

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

Attention: Mr. Thomas M. Novak, Assistant Director Operating Reactor

Gentlemen:

8009230440

DOCKET NOS. 50-266 AND 50-301 MINIMUM LEVEL OF WATER OVER FUEL ASSEMBLIES POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

Your letter to all Westinghouse pressurized water reactor licensees dated August 15, 1980, requested that we review the Technical Specifications and procedures in use at our Point Beach Nuclear Plant Units 1 and 2 to assure that exposure of fuel assemblies and control rods cannot occur during transfer while the plant is in the refueling shutdown mode. As discussed in Section 11.2.2 and shown on Figures 1.2-6 and 1.2-13 of the Point Beach Nuclear Plant Final Facility Description and Safety Analysis Report, the refueling cavity is flooded with borated water to elevation 64 feet 8 inches during refueling operations. This water level provides approximately 24 feet of water over the reactor vessel flange and ensures that a minimum of 10 feet of water will be above the top of a fully withdrawn fuel assembly.

During routine refueling fuel transfer operations, the water volume in the refueling cavity and the water volume in the spent fuel pool storage area are connected via the fuel transfer tube. In the unlikely event that the water level in the refueling cavity were to drop during refueling operations, a corres, unding level drop would occur in the spent fuel pool. A water level sensor in the spent fuel pool provides a low level alarm in the plant control room at a water elevation of 59' 10". At this low level alarm point there would still be more than 5 feet of water over any withdrawn fuel assembly.

There is also a radiation monitor located on the bridge of the fuel handling and transfer manipulator crane. This monitor has an associated local alarm that is set approximately 10 mr above normal background. If a spent fuel assembly were to approach the surface of the refueling cavity, this monitor would sense the increased radiation level and actuate the alarm. The level and radiation alarms provide assurance that exposure of fuel assemblies cannot occur during transfer operations.

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In light of these design and operational provisions, including the presence of a low level alarm which would provide notification of any decrease in water level in the refueling cavity, we have determined that procedural revisions or specification changes are not necessary to provide the assurance requested in your letter. Since the Point Beach Technical Specifications do not include the Standard Technical Specification provision discussed in your letter, no change to the Technical Specifications is necessary. Please contact us if you have any questions regarding our response to this topic.

Very truly yours,

C. W. Fay, Director Nuclear Power Department

Copy to: NRC Resident Inspector Point Beach Nuclear Plant