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September 18, 1980

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

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
TECHNICAL SPECIFICATIONS FOR TMI LESSONS
LEARNED CATEGORY "A" ITEMS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On July 14, 1980, we received your letter dated July 2, 1980 to All Pressurized Water Reactor Licensees concerning proposed technical specifications applicable to implementation of the TMI-2 Lessons Learned Category "A" items. You requested that we submit a license amendment application to incorporate the applicable model specification enclosed with the letter within 60 days following receipt of the letter. As discussed in this letter, we are not able to comply with your request within the specified time frame.

We have completed our initial review of the model technical specifications provided with your letter and have observed that these items can be grouped into several categories. Some of the proposed specifications, such as several of the items listed with the Engineered Safety Feature Actuation System Instrumentation and Setpoints, are already covered in the Point Beach Nuclear Plant Technical Specifications. Other items, such as limiting conditions for operation for the steam generator auxiliary feedwater pumps, are already under consideration by the NRC in relation to other requirements (see our letter to you dated July 8, 1980). A number of the proposed specifications, such as requirements for position indicators and auxiliary feedwater flow rate detection, are premature at this time. Although systems are installed and operational which met these short-term requirements, these methods are not necessarily the final systems we intend to employ at Point Beach. Finally, we believe a few of these proposed specifications, such as your proposed Table 3.3-5 on ESF Response Times, should not be included in the Point Beach Nuclear Plant Technical Specifications.

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As a part of our continuing evaluation and implementation of all TMI Lessons Learned items, action plan statements, and other related NRC requirements, we have been conducting our own evaluation of the necessity to propose changes, revisions, or additions to the Point Beach Nuclear Plant Technical Specifications in order to enhance overall plant safety. We have divided these action items into four areas: active components, indicating components, facilities, and administrative matters. We are in the process of establishing our own policy for determining whether or not items in each of these categories require Technical Specification action. This policy can presently be summarized for each category as follows:

Active Components

Assess the importance to plant safety and, if safety-related, include in the Technical Specifications.

Indicating Components

1. Indication that performs an active safety function will be treated as an active component. The related active components are already part of the specifications.
2. If the indicating component is the sole source of indication necessary for operator action, and is related to the safety of the plant, it will be included in the Technical Specifications.
3. Components that are provided for indication only, and that are not directly safety related, will not be included in the Technical Specifications.

Facilities

The unavailability or degraded operation of a facility, such as the Technical Support Center, may be considered a reportable event but should not be considered as a Limiting Condition for Operation.

Administrative Matters

Items, such as shift staffing, staff overtime, training, staff qualification, and event reportability, will be reflected in the administrative Technical Specifications if they are in conflict with or substantially change the existing Specifications.

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As you know, the NRC has published in the July 8, 1980, Federal Register notice a proposed rulemaking on technical specifications. We and others have been concerned that the increased volume and scope of technical specifications may be decreasing the effectiveness of the specifications to focus the attention of licensees on matters of more immediate importance to the safe operation of the facility. The proposed rulemaking would consider modification to the definition of categories of technical specifications to sharpen this focus on safe operation and would define a new category of requirements that would be of lesser immediate importance to safety than technical specifications. We have always been in basic agreement with these concepts and they are reflected in our policy regarding technical specification changes.

As a result of our policy regarding our Technical Specifications and the TMI action items, we anticipate a series of license amendment applications consistent with the above guidelines spaced at approximately six-month intervals as we complete implementation of the various action items. We anticipate that the first such submittal, which would cover those items already completed and to be completed by the end of the year, would be submitted in January 1981. Therefore, as mentioned previously, we cannot appropriately presently comply with the license amendment schedule requested in your July 2 letter.

Your letter also asked that we consider the addition of two license conditions related to System Integrity Measurements Program and Improved Iodine Measurements capability. We have reviewed the proposed wording of these conditions in Enclosure 2 to your letter. We have already committed to such programs and our systems integrity program, except for the preventive maintenance provision, and iodine monitoring program are already established. These are housekeeping and monitoring matters and inclusion of these programs as license conditions serves no useful purpose. We would not propose amending our license to include these conditions.

We trust we have provided sufficient detail to demonstrate the basis for our delayed action is to provide a coordinated, well defined, and planned response to TMI concerns, appropriate to our plant and development programs. Should you have any questions regarding our policy in these matters, please let us know.

Very truly yours,

C. W. Fay, Director
Nuclear Power Department

Copy to NRC Resident Inspector
Point Beach Nuclear Plant