

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

Attention: Mr. Robert Clark, Chief

Operating Reactor Branch #3

Gentlemen:



REQUEST FOR WALVER OF TURBINE STOP AND GOVERNOR VALVES TEST
POINT BEACH NUCLEAR PLANT UNIT 2

Wisconsin Electric Power Company (Licensee) hereby makes application for an amendment to Facility Operating License DPR-27 for the Point Beach Nuclear Plant Unit 2 to permit a waiver of the turbine stop and governor valves test for the month of April 1981. Point Beach Nuclear Plant Technical Specification Table 15.4.1-2, Item 18 requires a monthly test of the turbine stop and governor valves to verify that these valves are functional. This test necessitates a reduction in power level to 70% in order that the appropriate valve exercising can be accomplished.

Point Beach Nuclear Plant Unit 2 has been in essentially continuous operation since its last refueling in April 1980. The turbine stop and governor valves were last tested on March 8, 1981. The March 8, 1981, test results were satisfactory as were all monthly tests during this present operating cycle. The next test of the Unit 2 turbine stop and governor valves will be required within one week of April 8, 1981. At that time Point Beach Nuclear Plant Unit 2 will be in stretch-out operation. The end-of-core life conditions of low boric acid concentration make load swing operations difficult because of xenon transients and flux tilts. Furthermore, near-end-of-life load swings are very costly in primary system water throughput and deborating resin consumption will result in subsequent increased radioactive waste for burial. Therefore, prudent operating practice and waste volume reduction urges minimizing reactor power cycling under these conditions.

To meet the present Technical Specification requirements, which who permit adjusting surveillance intervals by up to 25% to accommodate normal test schedules, the Unit 2 turbine stop and governor tests must be completed by April 14, 1981. Our present plans are to take Unit 2 out of

service on April 16 for the annual refueling outage. Thus, a waiver of this test requirement for the month of April 1981 would effectively result in only extending the surveillance interval by two days. For this reason and in light of similar waivers for this test requirement granted by the Nuclear Regulatory Commission in the past (the most recent dated March 17, 1978), we request your prompt consideration and approval of this license amendment for a one-time testing waiver.

In accordance with the provisions of 10 CFR Part 170.22, we have determined that this license amendment should be classified as a Class III Amendment. Accordingly, we have enclosed herewith a check drawn in the amount of \$4,000 for this amendment approval fee.

Very truly yours,

ive Vice President

Sol Burstein

Enclosure (Check No. 610064)

Subscribed and sworn to before me This farm and a comment

dichet Notary Public, State of Wisconsin

Copy to: NRC Resident Inspector

Point Beach Nuclear Plant