

March 4, 1982

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

Attention: Mr. R. A. Clark, Chief

Operating Reactors, Branch 3

Gentlemen:



DOCKET NO. 50-301
REQUEST FOR WAIVER OF TURBINE STOP AND GOVERNOR VALVES TEST
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 75
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 March 1982. 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, turbine stop and governor valves were last tested on February 20, 1982. These 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 March 20, 1982. At that time, Point Beach Nuclear Plant, Unit 2, will be in near-end-of-cycle life operations. 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. Prudent operating practice and radwaste volume reduction are sound reasons for minimizing reactor power cycling under these conditions.

To meet the present Technical Specification requirements, which permit adjusting surveillance intervals by up to 25% to accommodate normal test schedules, the Unit 2 turbine stop and

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governor tests must be completed by March 27, 1982. Our present plans are to take Unit 2 out of service on April 16, 1982 for the unit's annual refueling outage. We, therefore, request that effective in March 1982 the requirement for the monthly functional testing of the turbine stop and governor valves for Point Beach Unit 2 be waived until the start of the Unit 2 eighth refueling outage. In light of similar waivers for this test requirement granted by the Nuclear Regulatory Commission in the past (the most recent dated September 25, 1981), we request your prompt consideration and approval of this license amendment for this 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,

Assistant Vice President

C. W. Fay

Enclosure (Check No. 662603)

Copy to NRC Resident Inspector

Subscribed and sworn to before me this 4th day of March 1982.

Notary Public, State of Wisconsin

My Commission expires July 1,1984.