



**Wisconsin Electric** POWER COMPANY  
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September 30, 1982

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. 83  
SPENT FUEL POOL POISON SURVEILLANCE LOCATION AND  
POWER-OPERATED RELIEF VALVE OPERABILITY

In accordance with the requirements of 10 CFR Part 50.59, Wisconsin Electric Power Company (Licensee) hereby submits its application for amendments to Facility Operating Licenses DPR-24 and DPR-27 for the Point Beach Nuclear Plant, Units 1 and 2, respectively. The purpose of these amendments is to authorize a change to the Point Beach Technical Specifications permitting locating of the spent fuel pool poison surveillance specimen in a position adjacent to the spent fuel pool divider wall and clarification of the limiting conditions for operation of the power-operated relief valves (PORV) and PORV indication.

Presently Specification 15.5.4.4 states that each spent fuel assembly storage location immediately adjacent to a spent fuel pool wall shall be restricted to storage of fuel assemblies having a cooling time of one year or more. As a part of the surveillance program established to verify the long-term acceptability of the borated silicon rubber neutron absorber sheets, Licensee has also committed to keeping a freshly discharged fuel assembly on each side of the poison surveillance samples. Poison surveillance sample location slots were provided in both the north and south halves of the spent fuel pool, however, in the south spent fuel pool the surveillance sample poison location slot is adjacent to the spent fuel pool divider wall. This wall separates the north and south halves of the spent fuel pool. Unless the Technical Specification change proposed in this letter is approved, Licensee would have to maintain the poison surveillance samples in the north pool location or relocate the poison sample location in the south pool.

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The latter option would require temporarily relocating all the stored spent fuel assemblies into the north pool so that a diver could enter the south pool to relocate the poison surveillance sample storage slot. This would result in personnel radiation exposure which may be avoided if the following changes were approved.

We hereby propose that Specification 15.5.4.4 be revised to read:

"Except for the two storage locations adjacent to the designated slot for the spent fuel storage rack neutron absorbing material surveillance specimen irradiation, spent fuel assembly storage locations immediately adjacent to the spent fuel pool perimeter or divider walls shall not be occupied by fuel assemblies which have been subcritical for less than one year."

A revised spent fuel pool gamma heating evaluation has been completed for the case of two three-day decay fuel assemblies placed in storage locations immediately adjacent to the spent fuel pool divider wall. The analysis model gave a calculated concrete temperature of 206°F. Bechtel Power Corporation, the contractor who conducted this analysis for Wisconsin Electric, concluded that the divider wall will not incur any structural damage or reduction of capacity as a result of having two three-day decay fuel elements stored in the adjacent spent fuel storage rack locations.

Specification 15.3.1.A.4 requires that if a PORV is inoperable, the PORV shall be restored to operation within one hour or the associated block valve shall be shut. The basis for this specification defines a PORV as being operable if leakage past the valve doesn't exceed Specification 15.3.1.D limits and the PORV has met its most recent channel test. The limiting conditions for operation in Specification 15.3.1.A.4, however, do not differentiate between having the PORV inoperable because of leakage or because of failure to satisfy the channel functional test. In the latter case, placing the control switch for the PORV in the closed position disables the control circuitry for the PORV operation and would assure that the valve remained shut regardless of the status of pressure signals to the automatic control circuitry. This would preclude having to unnecessarily cycle closed the associated block valve. If for any reason the PORV were leaking, both temperature and flow indicators would indicate the leakage and, under these circumstances, the associated block valve could then be closed. A revision to this specification has been provided with the attached proposed Technical Specification pages.

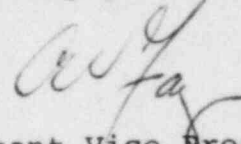
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A similar argument can be made for not closing the block valve if the PORV position indicator is inoperable. Table 15.3.5-5, item 1, presently requires the block valve associated with a PORV to be shut if an inoperable PORV valve position indicator cannot be restored to operation within 48 hours. Again, placing the PORV control switch in the closed position will ensure the PORV remains shut regardless of the status of the PORV control circuitry or position indication and precludes unnecessary cycling of the PORV block valves. If leakage past the PORV somehow develops, other sensors will indicate this leakage and, at that time, the block valve can be shut. We also request that the time period allowed to correct a defective PORV or block valve position indication be extended to 96 hours. This relaxation would permit Licensee more flexibility in scheduling corrective maintenance prior to having to take the action specified in column 3 of Table 15.3.5-5.

In accordance with the schedule of amendment approval fees for reactor facility licenses as listed in 10 CFR Part 170.22, Licensee has determined that this license amendment approval for Point Beach Nuclear Plant Unit 1 should be classified as a Class III amendment in that the proposed Technical Specification changes do not involve any significant hazards considerations. The amendment approval for Point Beach Unit 2 is a duplicate of the Unit 1 request and is, therefore, classified as a Class I approval. Accordingly, a check in the amount of \$4,400 is enclosed as payment for the applicable Class III and I approval fees.

As further specified in the Commission's regulations, we enclose herewith three signed originals and, under separate cover, 40 copies of this application for license amendments. Please contact us if you have any questions concerning this submittal.

Very truly yours,



Assistant Vice President

C. W. Fay

Attachment (Check No. 695113)

Subscribed and sworn to before me  
this 30th day of September 1982.

Scotty Fleischman  
Notary Public, State of Wisconsin

My Commission expires July 1, 1984.

Copy to NRC Resident Inspector