



231 W Michigan, PO Box 2046, Milwaukee, WI 53201-2046

(414) 221-2345

VPNPD-95-013
NRC-95-007

10CFR50.4
10CFR50.90

January 24, 1995

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATIONS CHANGE REQUEST 176
ADMINISTRATIVE CHANGES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 50.90, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant (PBNP), Units 1 and 2, respectively, to incorporate changes to the plant Technical Specifications. The proposed changes modify Technical Specifications Section 15.6.5, "Review and Audit;" and Section 15.7.8, "Administrative Controls;" by removing Quality Assurance audit frequencies, removing Section 15.6.5.4, "Emergency Plan Reviews," and extending the radioactive effluent reporting period from semiannual to annual. Likewise, all references to "Semiannual Monitoring Report" are changed to "Annual Monitoring Report."

The proposed specifications are similar to those of the Kewaunee Nuclear Power Plant (Amendment 103 dated November 5, 1993). Marked-up Technical Specifications pages, a safety evaluation, and a no significant hazards consideration are enclosed.

DESCRIPTION OF THE CURRENT LICENSEE CONDITION

Technical Specifications Section 15.6.5.2.8 describes audits performed under the cognizance of the Off-Site Review Committee (OSRC). Sections 15.6.5.3 and 15.6.5.4 describe the requirements for fire protection audits and emergency plan reviews, respectively.

9502010320 950124
PDR ADOCK 05000266
P PDR

A subsidiary of Wisconsin Energy Corporation

A001
111

Technical Specifications Section 15.7.3, "Radioactive Effluent Monitoring Instrumentation Operability Requirements," specifies the operability and alarm or trip setpoint requirements for liquid and gaseous effluent monitoring instrumentation.

Technical Specifications Section 15.7.6, "Radioactive Effluent Sampling and Analysis Requirements," specifies the sampling frequency, analysis frequency, and analysis requirements for radioactive liquid and gaseous effluents.

Technical Specifications Section 15.7.7, "Operational Environmental Monitoring Program," specifies operational environmental radioactivity monitoring and sampling requirements. Technical Specifications Section 15.7.8.2, "Audits," describes the audit requirements for the Offsite Dose Calculation Manual, Process Control Program, and Environmental Monitoring Program.

Technical Specifications Section 16.5, "Reporting Requirements," specifies the reporting requirements for non-radiological releases.

DESCRIPTION OF THE PROPOSED CHANGES

The proposed changes are as follows:

1. A modification to Specification 15.6.5.2.8(a) to remove "at least once per year." Specification 15.6.5.2.8(a) requires audits in the area of conformance to Technical Specifications and applicable license conditions.
2. A modification to Specification 15.6.5.2.8(b) to remove "at least once per year." Specification 15.6.5.2.8(b) requires audits in the area of the performance, training, and qualifications of the licensed operating staff.
3. A modification to Specification 15.6.5.2.8(c) to remove "at least twice per year at approximately six month intervals." Specification 15.6.5.2.8(c) requires audits in the area of corrective actions.
4. A modification to Specification 15.6.5.2.8(d) to remove "quarterly," "at least once per two years," and change "Quality Assurance Division" to "quality assurance organization." Specification 15.6.5.2.8(d) requires audits of the results of the Quality Assurance program audits that are conducted to verify conformance to the criteria of Appendix B to 10 CFR 50.

5. A modification to Specification 15.6.5.3(a) to remove the annual audit frequency.
6. Specification 15.6.5.3(b) is deleted. The option for a periodic inspection and audit utilizing an outside fire protection firm will be maintained in Specification 15.6.5.3(a).
7. Removal of existing Section 15.6.5.4, "Emergency Plan Reviews." Specification 15.6.5.4(a) requires a review of the emergency preparedness program. Since this review is conducted in accordance with 10 CFR 50.54(t), redundant Section 15.6.5.4 is removed.
8. A modification to Note 7 for Tables 15.7.3-1 and 15.7.3-2 (Page 15.7.3-7) to change "Semiannual Monitoring Report" to "Annual Monitoring Report."
9. A modification to Note 1 for Table 15.7.6-1 to change "Semiannual Monitoring Report" to "Annual Monitoring Report."
10. A modification to Note 1 for Table 15.7.6-2 to change "Semiannual Monitoring Report" to "Annual Monitoring Report."
11. Modifications to Specifications 15.7.7.A.2, A.3, C.3, and E.2 to change "Semiannual Monitoring Report" to "Annual Monitoring Report."
12. A modification to Specification 15.7.8.2.A to remove the 24-month audit frequency requirement. Specification 15.7.8.2.A requires an audit of the activities encompassed by the Offsite Dose Calculation Manual and the process control program and its implementing procedures.
13. A modification to Specification 15.7.8.2.B to remove the 12-month audit frequency requirement. Specification 15.7.8.2.B requires an audit of the radiological environmental monitoring program.
14. Existing Specification 15.7.8.2.C is deleted. The requirement for the reporting of audit results will be maintained in accordance with existing Specification 15.6.5.2.9.

15. A modification to Specification 15.7.8.4.A to reflect the change to annual radiological effluent reporting as follows:

A. Semiannual Annual Monitoring Report

~~A report within 60 days after January 1 and July 1 each year for the six month period or fraction thereof, ending June 30 and December 31 covering the operation of PBNP for the previous twelve (12) month period, or fraction thereof, ending on December 31, shall be submitted by May 1 of each year containing: ..."~~

BASIS AND JUSTIFICATION

This Technical Specifications Change Request is the result of Wisconsin Electric Power Company's (WEPCO) continual efforts to improve the effectiveness and efficiency of its Quality Assurance activities and eliminate redundancy between the Point Beach Technical Specifications and the Code of Federal Regulations. Removal of the audit frequency requirements will allow WEPCO the flexibility to adjust frequencies and focus resources based on the performance of the program or organization being audited. The purpose, scope, and thoroughness of the audits will not be affected, management oversight of the audit process will not be diminished, and the audits will be performed at frequencies that meet 10 CFR 50 and ANSI 18.7-1976 (as committed to in PBNP FSAR Section 1.8) requirements.

This proposal also removes Technical Specifications Section 15.6.5.4, "Emergency Plan Reviews," due to redundant requirements specified in 10 CFR 50.54(t). The radiological effluent reporting period is also changed from semiannual to annual as specified in 10 CFR 50.36a. Likewise, all references to "Semiannual Monitoring Report" are changed to "Annual Monitoring Report."

The above changes are consistent with NUREG-1431, "WOG Improved Standard Technical Specifications."

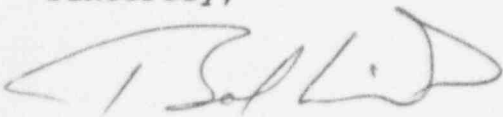
We have determined that the proposed amendments do not involve a significant hazards consideration, authorize a significant change in the types or total amounts of any effluent release, or result in any significant increase in individual or cumulative occupational exposure. We therefore conclude that the proposed amendments meet the requirements of 10 CFR 51.22(c)(9) and that an environmental impact statement or negative declaration and environmental impact appraisal need not be prepared.

Document Control Desk
January 24, 1995
Page 5

In summary, the proposed changes contained in this package will, when approved, enhance the safe operation of Point Beach Nuclear Plant. For this reason, we request that you process this change at your earliest opportunity.

Please contact us if you have any questions.

Sincerely,



Bob Link
Vice President
Nuclear Power

DAW/jg

Enclosures

cc: NRC Resident Inspector
NRC Regional Administrator, Region III
Public Service Commission of Wisconsin

Subscribed and sworn before me on
this 25th day of January 1995.

Ann M. Fitzgerald
Notary Public, State of Wisconsin

My commission expires 1-11-98.

TECHNICAL SPECIFICATIONS CHANGE REQUEST 176
SAFETY EVALUATION

INTRODUCTION

Wisconsin Electric Power Company (Licensee) is applying for amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. The proposed changes modify Sections 15.6.5 "Review and Audit," and 15.7.8 "Administrative Controls," by removing audit frequency requirements, removing Section 15.6.5.4, "Emergency Plan Reviews," and extending the radioactive effluent reporting period from semi-annual to annual. Likewise, all references to "Semiannual Monitoring Report" are changed to "Annual Monitoring Report."

EVALUATION

This change does not impact the actual operation of the plant, and will result in an improvement in plant safety by allowing greater flexibility to schedule audits and assign resources based on the level of performance in the area being audited. The audit program would focus more on areas of weak performance, and less on consistently high performance areas. Audits required to be performed at frequencies specified by 10 CFR 50 and ANSI 18.7-1976 (as committed to in FSAR Section 1.8); however, will continue to be performed at the minimum specified frequencies. The purpose, scope, and thoroughness of the audits will not be affected, and management oversight of the audit process will not be diminished.

This proposal also removes Technical Specifications Section 15.6.5.4, "Emergency Plan Reviews," due to redundant requirements specified in 10 CFR 50.54(t). Emergency Plan reviews will continue to be conducted in accordance with 10 CFR 50.54(t) as stated in Revision 5 of Point Beach Nuclear Plant Emergency Plan Maintenance Procedure (EPMP) 3.4, "Emergency Preparedness Program (EPP) Review." In addition, the requirement for a triennial fire protection and loss prevention program inspection and audit performed by an outside qualified fire consultant was deleted due to the availability of competent and experienced fire protection and loss personnel in-house.

On October 1, 1992, the radioactive effluent reporting requirement interval specified in 10 CFR 50.36a was increased from semiannual to annual (57 FR 39353, August 31, 1992). Therefore, this proposal changes our radioactive effluent reporting require-

ment from semiannual to annual in accordance with 10 CFR 50.36a. Likewise, all references to "Semiannual Monitoring Report" are changed to "Annual Monitoring Report."

These changes are consistent with NUREG-1431, "WOG Improved Standard Technical Specifications." No plant features provided to meet the design objectives of applicable General Design Criteria (GDCs) are affected by this proposal.

CONCLUSION

In summary, the proposed revision will enhance the effectiveness of the reporting, review, and audit programs and enhance the safe and reliable operation of Point Beach Nuclear Plant.

TECHNICAL SPECIFICATIONS CHANGE REQUEST 176
NO SIGNIFICANT HAZARDS CONSIDERATION

In accordance with the requirements of 10CFR50.91(a), Wisconsin Electric Power Company (Licensee) has evaluated the proposed changes against the standards of 10CFR50.92 and has determined that the operation of Point Beach Nuclear Plant, Units 1 and 2, in accordance with the proposed amendments, does not present a significant hazards consideration.

A proposed facility operating license amendment does not present a significant hazards consideration if operation of the facility in accordance with the proposed amendment will not:

1. Create a significant increase in the probability or consequences of an accident previously evaluated.
2. Create the possibility of a new or different kind of accident from any accident previously evaluated.
3. Will not create a significant reduction in a margin of safety.

The proposed changes are administrative in nature. There is no physical change to the facility, its systems, or its operation. Since the changes will allow more flexibility in assigning resources to work on poor or weak performance areas, the plant safety will be enhanced. Operation of PBNP in accordance with the proposed amendments cannot create an increase in the probability or consequences of an accident previously evaluated, create a new or different kind of accident, or result in a significant reduction in a margin of safety. Therefore, the proposed changes do not present a significant hazards consideration.