



**Wisconsin Electric** POWER COMPANY  
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October 7, 1983

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

Attention: Mr. J. R. Miller, Chief  
Operating Reactors Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
MODIFICATION TO CHANGE REQUEST NO. 33  
RADIOLOGICAL EFFLUENT TECHNICAL SPECIFICATIONS  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On January 28, 1980 Wisconsin Electric Power Company, Licensee for the Point Beach Nuclear Plant, Units 1 and 2, submitted a modification to its license amendment application and Technical Specification Change Request No. 33. This submittal included our proposed Radiological Effluent Technical Specifications (RETS) and reflected modifications to the original license amendment application submitted on June 4, 1976. Our January 28 letter was in response to additional NRC requirements and RETS guidance promulgated subsequent to the 1976 submittal. On June 2 and 3, 1982 our representatives met with NRC and NRC contractor personnel at the Point Beach Nuclear Plant to resolve questions concerning the January 28 RETS submittal. In a letter dated April 25, 1983, the NRC staff forwarded written comments from this meeting together with a revision of NUREG-0472, "Standard RETS for Pressurized Water Reactors", and requested that we develop a final RETS submittal utilizing the guidance of the meeting summary and the revised NUREG. This letter and the enclosed attachments are our response to that request.

We have provided herewith as Attachment 1 to this letter a completely revised proposed RETS for the Point Beach Nuclear Plant. These proposed pages supersede in their entirety the proposed Technical Specification changes enclosed with our January 28 letter. In addition to responding to those items resolved during the June 1982 meeting, this revision of our proposed Technical Specification changes includes updates to reflect those changes in effluent monitoring instrumentation resulting from the recently installed improved radiation monitoring system (RMS). Specific changes from the current Technical Specifications

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are indicated on each page by margin bars, except in those instances such as Sections 15.3.9 and 15.4.17 where the entire page has either been rewritten or represents new material.

Attachment 2 to this letter is the Point Beach Nuclear Plant Off-Site Dose Calculation Manual (ODCM). An ODCM was requested by the NRC. The manual contains the methodology for the determination of the gaseous and liquid effluent monitoring instrument trip setpoints and the methodology for establishing compliance with design release objectives. The manual also presents the methodology used in the calculation of off-site doses due to radioactive gaseous and liquid effluents.

Attachment 3 is the Point Beach Nuclear Plant Environmental Manual, Revision 2, dated June 1982. This manual is made a part of the ODCM by reference. The appendices to this manual are not included, as they consist of reference material from the Technical Specifications, the FSAR, and the State of Wisconsin Point Beach Discharge permit; such material is already held by the NRC. You will note that certain minor changes to the manual may become necessary after the RETS have been approved and issued by the NRC.

Attachment 4 is the Process Control Program (PCP) for the Point Beach Nuclear Plant. The PCP consists of plant procedures pertaining to radioactive waste processing and handling. A copy of each of the procedures listed by the PCP has been provided.

The final enclosure with this letter, Attachment 5, is entitled "Licensee's Comments on Summary of Discussion During Plant Visit on RETS Questions". This attachment includes additional information concerning many of those comments provided by the NRC and its contractor on our previous RETS submittal. As you know, in several cases resolution of these comments was not achieved during the June 1982 meeting or subsequent conversations. In most of these cases we have provided additional justification or clarification of our position in this attachment. This additional information should permit these items to be satisfactorily resolved.

As now required by 10 CFR 50.91, at the time a licensee requests a license amendment it must provide an analysis, using the standards in 10 CFR 50.92, concerning whether the subject action constitutes a significant hazards consideration. As guidance to licensees, the NRC published in the Federal Register, Volume 48, No. 67, examples of amendments that are considered not likely to involve significant hazards considerations. Among these examples were amendments consisting of changes that constitute additional limitations, restrictions, or controls not presently included in the Technical Specifications. The proposed RETS included as Attachment 1 to this letter are an example of additional limiting

Mr. H. R. Denton

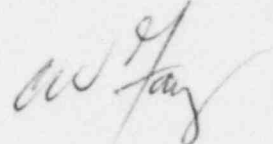
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conditions for operation and surveillance and administrative controls which are not presently included in the Technical Specifications. Accordingly, it is our conclusion that these proposed changes do not constitute a significant hazards consideration as defined in 10 CFR 92.

We have enclosed herewith three signed originals and forty copies of the letter and Attachment 1. We have also enclosed herewith one copy each of Attachments 2 through 5 and will provide, under separate cover, nine additional copies of these four attachments. We trust this letter and its attachments are responsive to your April 25 request and look forward to a final resolution of this subject. Please contact us if you have any questions concerning this material.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Attachments

Copies to NRC Resident Inspector  
C. F. Riederer, PSCW

Subscribed and sworn to before me  
this 17th day of October 1983.

Scotty Fleischmann  
Notary Public, State of Wisconsin

My Commission expires July 1, 1984.