



Wisconsin Electric POWER COMPANY
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June 8, 1984

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
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 99
CONTROL ROD INSERTION LIMITS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with Sections 50.59 and 50.90 of 10 CFR 50, Wisconsin Electric Power Company (Licensee) hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2, respectively. The purpose of these amendments is to incorporate changes into the Point Beach Technical Specifications which govern the control rod insertion limits which will allow greater operational flexibility with respect to control rod bank positioning as a means of minimizing localized rod control cluster assembly (RCCA) wear. Specific changes addressed by this application are identified by margin bars on the attached proposed Technical Specification pages and are discussed below.

Specification 15.3.10, Control Rod and Power Distribution Limits, has been revised to define "fully withdrawn" as equal to or greater than 225 steps. Accordingly, Figure 15.3.10-1, Control Bank Insertion Limits, has been revised.

An evaluation of inserting the RCCA to a parked elevation of 225 steps of the core was performed and showed the effects to be minimal. Redefinition of "fully withdrawn" as being 225 steps or greater does not alter the conclusions of the reload safety evaluations performed for the existing Unit 1 and 2 cycles. At 225 steps withdrawn, the RCCAs are only 0.3 inches into the active fuel. Because of the low rod worth in the top region of the core, the power distribution perturbations resulting from the shallow rod insertion are very small. FQ(Z) is expected to increase in the bottom of the core by less than 1%; and the axial offset is expected to be more negative by less than 1%. Sufficient peaking factors and DNB margin are available to accommodate this small perturbation in power distribution. The minimal reduction in shutdown

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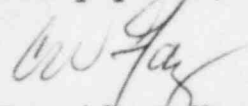
margin for an insertion of 3 steps can be easily accommodated by the substantial excess shutdown margin. The impact on other key safety parameters is negligible.

As required by 10 CFR 50.91(a) (1), we have prepared the following discussion concerning the issue of whether or not the proposed change involves any significant hazards consideration using the standards and criteria specified in 10 CFR 50.92. The Nuclear Regulatory Commission has provided guidelines concerning the application of these standards in 48 Federal Register 14870 which lists several categories of license amendments which are considered as very likely not to involve a significant hazards consideration. One of these categories involves changes which may reduce in some way a safety margin, but the results of the change are clearly within all acceptable criteria. As discussed above, the proposed change has a minimal effect on the power distributions and related safety parameters for Point Beach Units 1 and 2; however, the evaluated results are well within the parameters outlined in the Technical Specifications and do not invalidate the conclusions of the current cycle reload safety evaluations for Units 1 and 2. Accordingly, we believe the proposed revision to the Technical Specification does not constitute a significant safety hazards consideration.

In accordance with the schedule of fees for reactor facility license amendments as listed in 10 CFR 170.22, we have enclosed a check in the amount of \$4,400 for the review and approval of this amendment application. This amount consists of \$4,000 for a Class III approval fee for Point Beach Unit 1 and \$400 for a Class I, or duplicate, approval for Point Beach Unit 2.

We are enclosing herewith three signed originals and, under separate cover, forty copies of this amendment application. Please contact us if you have any questions concerning this submittal.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay
Enclosures (Check No. 790984)

Copies to N. R. C. Resident Inspector
C. F. Riederer, PSCW

Subscribed and sworn to before me
this 8th day of June, 1984.

Patricia Buzowski
Notary Public, State of Wisconsin
My commission expires May 29, 1988