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10CFR50.90

November 17, 1995

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

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATIONS CHANGE REQUEST 182
HEALTH PHYSICS MANAGER QUALIFICATION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, Units 1 and 2, hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27, respectively. The proposed amendments will incorporate changes to the plant Technical Specifications. These changes will allow management flexibility in meeting the Technical Specification required qualifications for the Health Physics Manager. A copy of the Technical Specifications including the proposed changes, the safety evaluation, and the determination of no significant hazards consideration are attached.

Existing License Condition

Technical Specifications Section 15.6.3, "Facility Staff Qualifications," Specification 15.6.3.2, delineates the qualification requirements for the Health Physics Manager. The Health Physics Manager, as used in this Specification, fulfills the requirements for professional-technical expertise required by Section 4.4.4 of ANSI N18.1-1971 in the Health Physics function. Specification 15.6.3.2 modifies and supplements the qualification requirements of ANSI N18.1-1971. Technical Specification 15.6.3.1 commits Point Beach Nuclear Plant to ANSI N18.1-1971.

Proposed License Condition

We proposed to modify Technical Specification Section 15.6.3, replacing Health Physics Manager with Health Physicist throughout the Specification.

Justification for Change

Prior to Amendments 128 and 132 for Point Beach Nuclear Plant, Units 1 and 2 respectively, the qualification requirements defined in Specification 15.6.3.2 applied to the position of Health Physicist. This position could be filled by a qualified individual separate from the management of the overall health physics organization and served to advise plant management on matters concerning radiological safety. The Specification did not prohibit the individual responsible for health physics organization management from filling the position.

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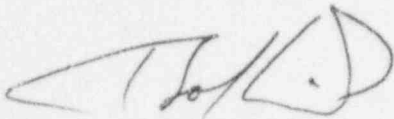
Amendments 128 and 132 were approved for Units 1 and 2 respectively, on September 4, 1991, following a reorganization such that the qualification requirements applied to the Superintendent-Health Physics who concurrently fulfilled the Health Physicist position. The title of Superintendent-Health Physics was changed in subsequent amendments to Health Physics Manager. Defined in this way, the Specification restricts the ability to rotate management personnel into the position of Health Physics Manager who are otherwise qualified to fill the health physics management position, thereby limiting overall management development.

Redesignating the Specification for the Health Physicist enables the plant manager to designate a qualified individual to fill this position without diluting the expertise available to advise plant management on radiological safety issues and allows appropriate utilization of management expertise.

We have reviewed the proposed changes and have determined that they are administrative only. Accordingly, the amendments meet the eligibility criteria for categorical exclusion set forth in 10CFR51.22(c)(10). Pursuant to 10CFR51.22(b), no environmental impact statement or environmental assessment need be prepared in connection with the issuance of the proposed amendments.

If you have any questions, or require additional information, please contact us.

Sincerely,



Bob Link
Vice President
Nuclear Power

TGM

cc: NRC Resident Inspector
NRC Regional Administrator
PSCW

Subscribed and sworn before me on
this 17th day of November 1995.


Notary Public, State of Wisconsin

My commission expires 10/27/96.

Attachment 1

SAFETY EVALUATION
TECHNICAL SPECIFICATIONS CHANGE REQUEST 182
HEALTH PHYSICS MANAGER QUALIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant (PBNP), requests changes to the Technical Specifications modifying the qualification requirement for the Health Physics Manager. The requirements, defined in Technical Specification 15.6.3.2 modify and supplement the requirements of ANSI N18.1-1971, Section 4.4.4 for profession-technical expertise available in the radiation protection organization. Point Beach Nuclear Plant is committed to ANSI N18.1-1971 as required by Technical Specification 15.6.3.1 for facility staff qualifications.

The requirements of Specification 15.6.3.2 place unnecessary restrictions upon the overall management of the PBNP health physics organization. The intent of the qualification requirements presently specified for the Health Physics Manager, is to ensure that appropriate expertise is available on the PBNP staff to assist and advise plant management in matters concerning radiological safety. ANSI N18.1-1971, Section 4.4.4 does not require this expertise to be specifically assigned to the management of the radiological protection organization.

Prior to amendments 128 and 132 issued on September 4, 1991, for PBNP Units 1 and 2 respectively, Specification 15.6.3.2 applied to the position of Health Physicist. The existing specification was reworded at that time to reflect organizational changes at PBNP in which the Health Physics Superintendent (Manager) position was formed in the organization. This position also met the qualification requirements for the Health Physicist. The proposed specification returns to this wording designating the qualification requirements for the Health Physicist.

The Health Physicist position will be designated in writing by the plant manager. The position of Health Physicist may be filled by supervisory or non-supervisory personnel who meet the qualification requirements. This will enhance the ability of plant management to ensure the appropriate expertise is used in the Health Physicist and Health Physics Manager positions, thereby enhancing the overall radiation protection function at PBNP.

The overall safety of the public and plant personnel will be assured and enhanced by this change.

Attachment 2

DETERMINATION OF NO SIGNIFICANT HAZARDS
TECHNICAL SPECIFICATION CHANGE REQUEST 182
HEALTH PHYSICS MANAGER QUALIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

We have evaluated the proposed change to Technical Specification 15.6.3.2 and 15.6.3.3 in accordance with the requirements of 10CFR50.91 against the standard in 10CFR50.92, and have determined that operation of the Point Beach Nuclear Plant in accordance with the proposed changes does not result in a significant hazards consideration. The proposed changes are administrative in nature, replacing the position title Health Physics Manager, with Health Physicist. Our evaluation against each requirement of the standard in 10CFR50.92 follows.

1. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments does not result in a significant increase in the probability or consequences of an accident previously evaluated.

The proposed changes separate the qualifications requirements of the Technical Specifications from the Health Physics Manager, while requiring that the same qualifications be fulfilled by a designated Health Physicist position within the organization. This change maintains the present knowledge requirements of the PBNP staff. The personnel holding the health physics qualifications are not considered in the probability of any accident. By ensuring the appropriate expertise remains on the staff to advise management on issues related to radiological safety, appropriate action is assured during analyzed events to assess and mitigate the radiological consequences. Therefore, this change does not affect the probability or consequences of any accident previously evaluated.

2. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not result in a new or different kind of accident from any accident previously evaluated.

The proposed change separates the Health Physics Manager qualifications from the position while maintaining the requirements for that expertise to be maintained within the organization. This is an administrative change only and does not affect any plant structures, systems and components. Therefore, a new or different kind of accident from any accident previously evaluated cannot result.

3. Operation of the Point Beach Nuclear Plant in accordance with the proposed amendments will not result in a significant reduction in a margin of safety.

The proposed changes are administrative only. The required levels of expertise and experience will be maintained within the Health Physics organization. Therefore, there is no reduction in a margin of safety.