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April 16, 1992

U.S. NUCLEAR REGULATORY COMMISSION  
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Washington, D.C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
MODIFICATION TO TEC SPEC CHANGE REQUEST 150  
QUARTERLY TESTING OF REACTOR PROTECTION  
AND SAFEGUARDS CIRCUITS  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated January 29, 1992, we submitted Technical Specification Change Request 150, "Quarterly Testing of Reactor Protection and Safeguards Circuits." This request proposed changes to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2, respectively, to allow quarterly testing of reactor protection and safeguards circuits vice monthly as presently required. Other changes were proposed, as necessary, to support the change in the testing interval.

As part of our proposed changes, we deleted a portion of the note delineated with a double asterisk (\*\*) at the bottom of Technical Specification Table 15.4.1-1, "Minimum Frequencies for Checks, Calibrations and Test of Instrument Channels," Page 1 of 4. The note presently reads, "Not required during periods of refueling shutdown but must be performed prior to starting up if it has not been performed during the previous surveillance period. Tests of permissive and low power trip bistable setpoints which cannot be done during power operations shall be conducted prior to startup if not done in the previous two weeks." In our Change Request, we deleted the second sentence of this note concerning the permissives and low power trip bistables. Our amendment request proposes adding the permissive testing requirements as a separate item, Item 44, to Table 15.4.1-1. Therefore, with the addition of Item 44 to the table, the portion of the note concerning permissive testing is no longer necessary.

The low power trip bistables cannot be tested at power. Therefore, the portion of the note concerning the low power bistable testing should not have been eliminated. The note ensures that the low power trip is tested prior to entering a low power operating condition during start-up if it was not tested during the previous surveillance interval. The note presently requires testing if a test was not performed during the previous

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April 16, 1992

Page 2

two weeks. This two-week interval corresponds to the biweekly test frequency specified in the original Point Beach Nuclear Plant Technical Specifications. We, therefore, request that the note be changed to read, "Not required during periods of refueling shutdown but must be performed prior to starting up if it has not been performed during the previous surveillance period. Tests of the low power bistable setpoint which cannot be done during power operation shall be conducted prior to starting up if not performed in the previous surveillance interval."


We have reviewed the safety evaluation enclosed with our January 29, 1992, submittal. That evaluation demonstrates the adequacy of the quarterly test interval for reactor protection and safeguards instrumentation at Point Beach Nuclear Plant. The evaluation adequately covers the proposed changes to this note.

This proposed rewording of the note is administrative in nature and is necessary to support the requested change to quarterly test intervals for reactor protection and safeguards circuits. Therefore, the conclusions reached in the "No Significant Hazards Determination" enclosed with our January 29, 1992, submittal are not altered. Operation of Point Beach Nuclear Plant in accordance with the proposed amendments does not result in a significant hazard.

A complete copy of the Technical Specification pages with the changes proposed in this letter and our January 29, 1992, submittal are attached.

If you have any questions, please contact us.

Sincerely,




James J. Zach  
Vice President  
Nuclear Power

Attachments

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector  
L. L. Smith, PSCW

Subscribed and sworn to before me  
this 16<sup>th</sup> day of April, 1992.

  
Notary Public, State of Wisconsin

My Commission expires 5-22-94.