

October 26, 1984

## CERTIFIED MAIL

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. 100
AUXILIARY FEEDWATER PUMPS AND
STEAM GENERATOR INSERVICE INSPECTION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with 10 CFR 50.59(c), Wisconsin Electric Power Company hereby requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for the Point Beach Nuclear Plant, Units 1 and 2, respectively. The purpose of these license amendments is to incorporate changes into the Technical Specifications. The proposed changes involve deletion of a limiting condition for operation concerning the auxiliary feedwater system and clarification of the inservice inspection requirements for the steam generators.

On May 4, 1983 the Commission issued License Amendments 73 and 78 to the Point Beach licenses. These amendments allowed temporary isolation of the shared motor-driven auxiliary feedwater pumps for a unit during period of startup, shutdown, and surveillance testing provided the turbine-driven auxiliary feedwater pumps were operable and capable of automatically delivering feedwater flow. This change was necessary to meet the requirements of Specification 15.3.4 that all four auxiliary feedwater pumps normally be operable with no more than one of the pumps permitted to be out of service for a limited period of time. In our application for these amendments dated March 24, 1984 we noted that we were studying hardware modifications to resolve NRC staff concerns regarding interpretations of auxiliary feedwater system operability and to provide automatic feedwater flow from the motor-driven auxiliary feedwater pumps under all circumstances. Details of these modifications were submitted to you with our letter dated June 20, 1983. Your letter dated September 15, 1983 concurred with our proposed modifications.

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On July 6, 1984 we sent you a letter reporting that the modifications to the auxiliary feedwater system motor-operated discharge valve operating logic had been completed. As you know, this modification provides assurance that automatic initiation of auxiliary feedwater flow to an affected unit's steam generators will occur even if the motor-operated pump discharge valves are initially closed. We, therefore, believe that the provisions of Specification 15.3.4.A.2.c are no longer necessary to permit temporary closing of these discharge valves and that this specification should be deleted.

The second series of changes in this amendment's application concerns Specification 15.4.2.A, "Steam Generator Tube Inspection Requirements". Item 2.a of this specification has been clarified to indicate that selection of one steam generator for inspection is permissible. Item 3 of this specification has been rewritten to acknowledge that strict compliance with Appendix IV to Section XI of the ASME Code would prohibit utilization of state-of-the-art inspection techniques not yet recognized by the Code. Item 7 of the specification is revised to acknowledge that reporting be in accordance with 10 CFR 50.73.ii rather than the superseded LER reporting specification. We have also rewritten the basis for this section to make it consistent with the specifications and our current practices.

Proposed Technical Specification pages, with the changes discussed in this application identified by margin bars, are attached. We have also enclosed page 15.6.10-1 with a change to Item 3 of that page to conform the specification to present terminology. This change was requested by the NRC staff.

As required by 10 CFR 50.91, we have examined these changes to determine whether the proposed revisions constitute a significant hazards consideration as defined by 10 CFR 50.92. In examining these changes we have considered the guidance previously provided by the NRC in the statement of consideration published with this rule at 48 Federal Register 14864. For the change to Specification 15.3.4 we believe that deletion of this restriction constitutes relief from an operating restriction that was imposed because acceptable operation was not yet demonstrated. The modifications discussed in our previous correspondence and reported as complete in our letter dated July 6 constitute demonstration of acceptable operation; therefore, this change does not constitute a significant hazards consideration.

The changes to Specifications 15.4.2 and 15.6.10 are administrative changes necessary to clarify the specifications and to achieve consistency in reporting requirements. Accordingly, these changes also do not constitute a significant hazards consideration.

Enclosed are three signed originals and forty copies of this amendments application and attachments. Also enclosed is a check in the amount of \$150 for the application fee specified by 10 CFR 170.12. Please contact us if you have any questions concerning these proposed changes.

Very truly yours,

Vice President-Nuclear Power

C. W. Fay

Enclosures (Check No. 813438)

Copies to NRC Resident Inspector R. S. Cullen, PSCW

Subscribed and sworn to before me this 29th day of October 1984.

Motary Public, State of Wisconsin

My Commission expires June 12 1988.