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VENPD-88-445
NRC-88-081

10 CFR 50.90

September 9, 1988

CERTIFIED MAIL

U. S. NUCLEAR REGULATORY COMMISSION
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Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 125
CONTAINMENT PURGE AND VENT SYSTEM
REQUIREMENTS DURING REFUELING OPERATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.59 and 50.90, Wisconsin Electric Power Company (Licensee) hereby submits an application for amendment to Facility Operating Licenses DPR-24 and DPR-27 for Point Beach Nuclear Plant, Units 1 and 2. The proposed amendment will revise portions of Technical Specification (TS) Section 15.3.8, "Refueling", in order to provide more specific and precise requirements. We have attached the Technical Specification pages containing the proposed revision and have identified the changes with margin bars.

TS Section 15.3.8 specifies operating limitations during refueling operations. Item 15.3.8.7 of this specification addresses operability of the containment vent and purge system. Presently this specification states:

"The containment vent and purge system, including the radiation monitors which initiate isolation shall be tested and verified to be operable immediately prior to refueling operations."

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The wording of this specification is not specific as to the meaning of "...immediately prior to refueling operations." With this wording, testing may be interpreted as being required as a one-time occurrence, immediately preceding the onset of refueling operations, or as frequently as each time a resumption of the movement of core components occurs.

Our proposed revision to TS 15.3.8.7 and our proposed new TS 15.3.8.8 are based on the more specific requirements of Section 3/4.9.4 of the Standard Technical Specifications for Westinghouse Pressurized Water Reactors, NUREG-0452, Revision 4. The specification, as modified, will require demonstration of the operability of the Containment Purge and Vent System "within four days prior to the start of and at least once per seven days during refueling operations." With these words, possible misinterpretation is removed without changing the intent of the original specification.

Additionally, the new TS 15.3.8.8 introduces an exception to the operability requirement of TS 15.3.8.7. It allows refueling operations to continue with the Containment Purge and Vent System inoperable, provided the purge and vent containment penetrations are closed. While this is a new specification and can be described as an operability exemption, it is not a relaxation of the specifications as they now exist. Since the intent of demonstrating operability of the isolation system is to prove that this active system will shut the purge and vent containment penetration valves when needed, the new TS 15.3.8.8 simply permits refueling operations to continue with the valves already in the safe, closed condition. This provision is also consistent with the Standard Technical Specifications.

Lastly, we have slightly modified the wording, but not the intent, of the existing TS 15.3.8.8, which becomes new TS 15.3.8.9, to identify more concisely the conditions under which refueling operations will cease. This is necessary due to the rewording of TS 15.3.8.7 and new TS 15.3.8.8.

As required by 10 CFR 50.91(a), we have evaluated these changes in accordance with the standards specified in 10 CFR 50.92 to determine if those proposed changes constitute a significant hazards consideration.

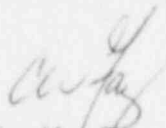
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The nature of this change constitutes a more restrictive operability requirement for an isolation system during refueling operations and, therefore, cannot affect the probability or consequences of a refueling accident. The proposed change also cannot create the possibility of a new or different kind of accident. Further, this proposal increases and does not reduce the margin of safety. We, therefore, conclude that the proposed amendment involves no significant hazards consideration.

In addition to the changes to TS 15.3.8 described in detail above, we are also requesting minor editorial changes to TS Table 15.7.3-2, TS Table 15.7.4-2, and TS Table 15.7.6-2. The changes to these tables are identical in nature, establishing system name which is consistent throughout the specifications, the "Containment Purge and Vent System". These particular changes do not involve a significant hazards consideration. The changes, by their simple editorial nature, cannot be associated with any of the three criteria of 10 CFR 50.92(c).

A check in the amount of \$150 is enclosed for the application fee as prescribed in 10 CFR 170. Please contact us if you have any questions concerning this request.

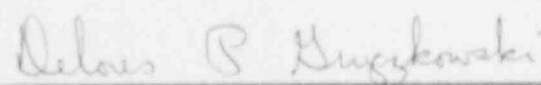
Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Enclosures (Check 644736)

Copies to NRC Regional Administrator - Region III
NRC Resident Inspector
R. S. Cullen, PSCW

Subscribed and sworn to before me
this 9th day of September, 1988.


Notary Public, State of Wisconsin

My Commission expires 5-27-90.