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10 CFR 50.4

10 CFR 50.90

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U.S. NUCLEAR REGULATORY COMMISSION
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Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 200
ENVIRONMENTAL MONITOR SURVEILLANCE REQUIREMENT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.4 and 10 CFR 50.90, 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, to incorporate changes to the Technical Specifications. The proposed change modifies Technical Specifications Section 15.4.1, "Operational Safety Review," by removing the requirement to check environmental monitors on a monthly basis.

Technical Specifications Table 15.4.1-1, "Minimum Frequencies For Checks, Calibrations, And Tests Of Instrument Channels," Item 30, "Environmental Monitors," requires a monthly check of the monitors under all plant operating conditions. This check pertained to ionization chambers utilized during the early operations of PBNP. These monitors were removed from the Radiological Environmental Monitoring Program (REMP) by Amendments 20 and 25 to DPR-24 and DPR-27, respectively, on September 23, 1976. The surveillance should also have been removed at that time. It is believed that failure to remove the related surveillance requirement was an administrative oversight at that time.

A description and basis for the proposed change, safety evaluation, no significant hazards determination, and a mark-up of the affected Technical Specifications page with the change indicated are attached.

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

Sincerely,

Mark E. Reddemann
Site Vice President
Point Beach Nuclear Plant

Attachments 100032

cc: NRC Resident Inspector
NRC Regional Administrator
PSCW

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PDR ADOCK 03000266
P PDR

Subscribed and Sworn before me the
 day of October, 1998

Notary Public, State of Wisconsin
My commission expires September 16, 2001

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A001

DESCRIPTION AND BASIS FOR CHANGE
TECHNICAL SPECIFICATION CHANGE REQUEST 200
ENVIRONMENTAL MONITOR SURVEILLANCE REQUIREMENTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Technical Specifications Table 15.4.1-1, "Minimum Frequencies For Checks, Calibrations, And Tests Of Instrument Channels," provides requirements for checks, tests and calibrations of instrumentation at PBNP at sufficiently frequent intervals to assure safety plant operation. Wisconsin Electric proposes to delete Item 30, "Environmental Monitors," as follows:

<u>NO.</u>	<u>CHANNEL DESCRIPTION</u>	<u>CHECK</u>	<u>CALIBRATE</u>	<u>TEST</u>	<u>PLANT CONDITIONS WHEN REQUIRED</u>
30.	<u>Environmental Monitors Deleted</u>	M	-	-	<u>ALL</u>

Basis for Change

The Environmental Monitors referred to in Item 30 of Technical Specifications Table 15.4.1-1 were ionization chambers used to measure environmental radiation levels as part of the early operational phases of the Radiological Environmental Monitoring Program (REMP). The use of these monitors to measure radiation in the environs in the vicinity of the Point Beach Nuclear Plant (PBNP) was eliminated from the REMP as requested by Wisconsin Electric in Technical Specifications Change Request 26 submitted to the NRC on September 10, 1975.

Amendments 20 and 25 to the Unit Operating Licenses DPR-24 and DPR 27, respectively, issued on September 23, 1976, approved the requested change.

The line item is noted as "Deleted" so as not to alter present table numbering. Altering the numbering would render many references in plant documents to the Technical Specification Table line items incorrect. Maintaining existing item numbering will ensure the integrity of existing related plant documents, principally procedures which implement existing requirements.

A review was performed of plant documents to verify that the TS Table 15.4.1-1, Item 30, was referring to the ionization chambers which were deleted from the REMP by Amendments 20 and 25. The results of this review follow.

The pre-operational REMP for PBNP utilized film badges to analyze for integrated doses on a monthly basis. [FFDSAR (1973) Table 2.8-1]. Although not explicitly listed in Table 2.8-1, the narrative in Section 2.8 states that "stray ionization chambers" also are used with film badges. The use of the chambers was documented in the Basis for Technical Specification 15.4.10, "Operational Environmental Monitoring" (April 20, 1970), which stated that gamma radiation detectors are used to detect changes in environmental radioactivity.

Amendment 9 to the FFDSAR stated that "[c]onsideration is being given to incorporating TLD badges into the program." Table 9 of the Final Environmental Statement (p. 56, May 1972),

"Post-Operational Environmental Radioactivity Survey for the Point Beach Nuclear Plant," indicates that film badges had been replaced by TLDs and that the TLDs and ion chambers are analyzed at monthly and quarterly frequencies. This analytical frequency is also indicated in the FFDSAR (May 30, 1973) Table 2.8-2, which details the operational REMP with two sets of TLDs (monthly and quarterly), and monthly "stray radiation chambers." The "stray radiation chambers" are the same as the "ion chambers" in Table 9 of the Final Environmental Statement and the "gamma radiation chambers" mentioned in TS 15.4.10. Therefore, the monthly check refers to either the ion chamber analyses or the TLD analyses because both are done on a monthly frequency.

The conclusion that the monthly checks of Table 15.4.1-1 refers to the ion chambers and not the TLDs is based on the operational mode of these devices. The basis statement of TS 15.4.1 states that "[f]ailures such as blown instrument fuses, defective indicators, faulted amplifiers which result in 'upscale' or 'downscale' indication can be easily recognized by simple observation of the function of an instrument or system." TLDs have no fuses, amplifiers or any other electrical or mechanical component which require a monthly check to verify their correct functioning. TLDs are passive devices which integrate radiation exposure and are sent to a contracted vendor for analysis. PBNP does not have the instrumentation necessary for TLD analyses.

Further evidence pointing to the environmental monitors as being the ion chambers is provided by 1974 letter from Wisconsin Electric's R.P. Rouse to John E. Stolzenberg, Science Research Analyst for the State of Wisconsin Legislative Council. In response to Mr. Stolzenberg's April 7, 1975 letter, Mr. Rouse states that all environmental sample analyses are done by a contractor with the only exception being radiation chambers which are read by plant personnel. Therefore, it is concluded that TS Table 15.4.1-1, Item 30, regarding monthly checks of environmental monitors refers to the ion chambers and not the TLDs.

In 1975, Wisconsin Electric reviewed the then current REMP and concluded that monthly ion chambers and monthly TLDs were not needed for the monitoring of ambient radiation levels. Only quarterly TLDs were necessary. The monthly ion chambers and TLDs were removed from the REMP by License Amendments 20 and 25, issued September 23, 1976 as requested by Wisconsin Electric in Technical Specifications Change Request 26, dated October 25, 1975. Based on NRC approval, Wisconsin Electric issued Revision 0 of the Environmental Manual. This manual only lists quarterly TLDs for monitoring ambient radiation levels in the PBNP environs. The related surveillance requirement should have also been removed at that time. Therefore, this is an administrative change necessary to correct a previous oversight.

SAFETY EVALUATION

TECHNICAL SPECIFICATION CHANGE REQUEST 200

ENVIRONMENTAL MONITOR SURVEILLANCE REQUIREMENT

POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

INTRODUCTION

Wisconsin Electric Power Company (licensee) is applying for an amendment to Facility Operating Licenses DPR-24 and DPR-27, for Point Beach Nuclear Plant, Units 1 and 2, respectively. The proposed change deletes Technical Specifications (TS) Table 15.4.1-1, Item 30, which requires a monthly surveillance of Environmental Monitors. The Environmental Monitors referred to by this item consisted of ionization chambers which were removed from the program by Amendments 20 and 25, dated September 23, 1976. This change corrects an oversight, in that the related surveillance requirement should have been eliminated at that time.

EVALUATION

The proposed change will not impact the operation of the plant or the monitoring of plant environs. This is an administrative change which deletes TS Table 15.4.1-1, Item 30 which requires a monthly check of the environmental monitors. The monitors referred to by this item were ionization chambers used during the pre-operational and early operational phase of the PBNP Radiological Environmental Monitoring Program (REMP) to measure ambient environmental radiation. These ion chambers were removed from the program by Amendments 20 and 25 to the PBNP Operating Licenses approved September 23, 1976. Ion chambers were replaced with TLDs that are analyzed quarterly. The TLDs continue to be part of the current REMP for the measurement of ambient radiation levels.

Therefore, since removal of the ion chambers from the program was previously approved by the NRC. This proposed change is administrative only, correcting a previous oversight. No actual change to the facility, its operation, or monitoring of the environmental effects of facility operation is being made.

CONCLUSION

The proposed revision is an administrative change only, deleting a surveillance requirement for environmental monitoring instrumentation previously removed from the Technical Specification. Monitoring of the PBNP environs continues under an approved and controlled program by comparable or better monitoring devices. Therefore, the safe operation of PBNP and protection of the health and safety of the public is not compromised by the proposed change.

NO SIGNIFICANT HAZARDS DETERMINATION
TECHNICAL SPECIFICATION CHANGE REQUEST 200
ENVIRONMENTAL MONITOR SURVEILLANCE REQUIREMENT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.91, Wisconsin Electric has evaluated operation of the Point Beach Nuclear Plant in accordance with the proposed changes against the standards of 10 CFR 50.92. Operation of the Point Beach Nuclear Plant in accordance with the proposed changes results in no significant hazards determination. Our evaluation and basis for this conclusion 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 any accident previously evaluated.

The proposed change eliminates a surveillance requirement for environmental monitors. The environmental monitors referred to by this surveillance were eliminated from the Radiological Environmental Monitoring Program and from the Technical Specifications by previous amendments. Therefore, this change is administrative in nature in that it corrects a previous administrative oversight. The requirement is not related to any accident initiator or accident mitigation structures, systems or components for any previously evaluated accident. Therefore, no increase in the probability or consequences of a previously evaluated accident can result.

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

The amendments remove a surveillance requirement from the Technical Specifications related to environmental monitors. The environmental monitors were removed from the environmental monitoring program by previously approved amendments. The surveillance requirement is not related to an existing design feature of PBNP. Therefore, elimination of the surveillance requirement cannot create a new or different kind of accident from any accident previously evaluated.

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

Margins of safety are defined by the safety limits and design limits for PBNP. The surveillance is not related to, nor does it affect, these limits. Monitoring of the environment continues under an approved Radiological Environmental Monitoring Program which ensures that any changes in radiation levels in the environs is detected, thus ensuring the impact of PBNP operation on the environment is minimized. Therefore, the proposed change cannot result in a significant reduction in a margin of safety.