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VPNPD-86-106
NRC-86-22

March 5, 1986

CERTIFIED MAIL

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. G. Lear, Project Director
PWR Project Directorate No. 1

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 109
REACTOR COOLANT IODINE ACTIVITY REPORTING REQUIREMENTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with Sections 50.59 and 50.90 of 10 CFR 50, Wisconsin Electric Power Company (Licensee) requests amendments to Facility Operating Licenses DPR-24 and DPR-27 for the Point Beach Nuclear Plant, Units 1 and 2, respectively. The proposed changes are to the technical specifications which involve limiting conditions for operation and reporting requirements relative to reactor coolant specific activity level (Dose Equivalent I-131). This change request is submitted in response to Generic Letter 85-19, "Reporting Requirements on Primary Coolant Iodine Spikes", issued September 27, 1985. Proposed Technical Specification pages, with the changes identified by margin bars, are enclosed with this application.

Generic Letter 85-19 addressed two items. The first item addressed was reporting requirements relating to primary coolant specific activity levels, specifically, primary coolant iodine spikes. In an effort to delete unnecessary reporting requirements, it was determined that the reporting requirements for iodine spiking can be reduced from a short-term report (Special Report or Licensee Event Report) to an item which is to be included in the Annual Results and Data Report.

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The second item addressed was elimination of unnecessary Technical Specification requirements relative to iodine activity limits. Specifically, the requirement to shut down a plant if coolant iodine activity levels are exceeded for 800 hours in a consecutive 12-month period can be deleted.

Our proposed revision to Technical Specification 15.3.1.C.1.a eliminates reference to the 800-hour limitation and the requirement to prepare a Special Report in the event of operation while in excess of the iodine limit for 500 hours in a consecutive six-month period. Additionally, Specification 15.3.1.C.3 has been deleted. Conjunctionally, the proposed revision to Specification 15.6.9.1.B.2 adds a section addressing reactor coolant activity as a part of the Annual Results and Data Report.

Lastly, we propose deletion of Specification 15.6.9.2.D which describes Unique Reporting Requirements in the event of exceeding primary coolant specific activity limits.

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 they constitute a significant hazards consideration. This amendments application is submitted at the request of the NRC. Justification for the changes is provided in Generic Letter 85-19. A proposed amendment involves no significant hazards considerations if operation of the facility in accordance with the amendment would not: 1) involve a significant increase in the probability or consequence of an accident previously evaluated, 2) create the possibility of a new or different kind of accident from any accident previously evaluated, or 3) involve a significant reduction in a margin of safety. This amendment involves: 1) a change in reporting requirements and 2) a deletion of a requirement to shut down a plant when iodine limits are exceeded over a long term. The first change is purely administrative and does not meet the criteria of 10 CFR 50.92 as posing a significant hazards consideration. The second change was initiated by the NRC with the reasoning that "proper fuel management by the licensee and existing reporting requirements should preclude ever approaching the limit". The high quality of present-day nuclear fuel combined with other existing reporting requirements for out-of-specification specific activity makes the 800-hour shutdown requirement superfluous. Therefore, the significant hazards criteria of 10 CFR 50.92 are not applicable to this change and we maintain that this amendment involves no significant hazards consideration.

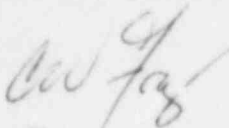
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We have enclosed a check for \$150. This check is submitted in accordance with 10 CFR 170.21 as the fee for an amendments application.

We are providing three signed originals and, under separate cover, forty copies of this license amendments application.

Please contact us if you have any questions regarding this submittal.

Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Enclosures (Check No. 894707)

Subscribed and sworn to before me
this 7th day of March, 1986.

Gloria J. Monson
Notary Public State of Wisconsin

My Commission expires June 12, 1988

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