



Wisconsin Electric POWER COMPANY
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VPNPD-86-166
 NRC-86-30

April 10, 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:

DOCKET NOS. 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST NO. 108
RECORDS RETENTION AND ADMINISTRATIVE CHANGES
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 amendments to Facility Operating Licenses DPR-24 and DPR-27 for the Point Beach Nuclear Plant, Units 1 and 2. The purpose of these amendments is to incorporate changes to Specification 15.6.10, "Plant Operating Records", as well as numerous changes to other specifications. These additional proposed changes are administrative in nature. Attached are Technical Specification pages containing the proposed changes which are identified by margin bars.

Technical Specification 15.6.10 has been largely rewritten to conform to the required retention period for plant operating records. In general, records and logs previously retained for six years would be retained for five years and records and logs previously retained "permanently" would be retained for the duration of the Operating License.

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Each proposed change to Specification 15.6.10 is addressed as follows:

1. TS 15.6.10 Specification

Existing Item: "Records and logs relative to the following items shall be retained for six (6) years unless a longer period is required by applicable regulations."

Proposed Change: "...five (5) years..."

Reference: The Standard Technical Specifications (STS) for Westinghouse Pressurized Water Reactors provides for five-year retention.

2. TS 15.6.10.A

Existing Item: "Records of normal plant operation, including power levels and periods of operation at each power level." (6 years)

Proposed Change: "Records of normal plant operation, including power levels and periods of operation at each power level, shall be retained for five years except those records of transient or operational cycles for reactor coolant system (RCS) components having a limited number of design transients shall be retained for the duration of the Operating License."

Reference:

- a. STS 6.10.1.a
- b. STS 6.10.2.e

3. TS 15.6.10.B

Existing Item: "Records of principal maintenance activities, including inspection, repair, substitution, or replacement of principal items of equipment pertaining to nuclear safety." (6 years)

Proposed Change: "Records of principal maintenance activities, including inspection, repair, substitution, or replacement of items of equipment pertaining to nuclear safety, shall be retained for a period of five years where these requirements

do not conflict with requirements of 10 CFR 50.49(j), 10 CFR 50.59, and surveillance requirements of these Technical Specifications. The quality assurance, environmental qualification, installation, and service life records of components covered by these requirements shall be retained for the duration of the Operating License."

Reference:

- a. STS 6.10.1.b
 - b. STS 6.10.2.1
4. TS 15.6.10.C

Existing Item: "Records of Licensee Event Reports." (6 years)

Proposed Change: (5 years)

Reference: STS 6.10.1.c

5. TS 15.6.10.D

Existing Item: "Records of periodic checks, inspections, and calibrations performed to verify that surveillance requirements are being met." (6 years)

Proposed Change: "Records of installation, environmental qualification, periodic checks, inspections, and calibrations of equipment pertaining to nuclear safety to verify that surveillance requirements are being met will be retained for the duration of the Operating License. All other records of this type will be retained for five years."

Reference: STS 6.10.1.d. Note, this item is similar to TS 15.6.10.B. STS 6.10.1.d only requires five-year retention without the caveat of "pertaining to nuclear safety". In order to achieve consistency, the proposed change is worded similar to TS 15.6.10.B.

6. TS 15.6.10.E

Existing Item: "Records of new and spent fuel inventory and assembly histories." (Permanent)

Proposed Change: (5 years following transfer)

Reference:

- a. 10 CFR 70.32(c)(2)
- b. 10 CFR 70.51(b)(3) and (b)(5)
- c. 10 CFR 70.51(e)(1)(iii) and (iv)
- d. 10 CFR 72.51(a)(d)

7. TS 15.6.10.F

Existing Item: "Records of changes made to the plant and to plant drawings as described in the FFDSAR." (Permanent)

Proposed Change: "Records of design modifications made to systems and equipment, including drawings, as described in the FSAR." (Duration of Operating License)

Reference:

- a. STS 6.10.2.a
- b. 10 CFR 50.59(b)

8. TS 15.6.10.G

Existing Item: "Records of plant radiation and contamination surveys." (Permanent)

Proposed Change: (Duration of Operating License)

Reference:

- a. 10 CFR 20.401(c)

9. TS 15.6.10.H

Existing Item: "Records of off-site environmental surveys." (Permanent)

Proposed Change: (Duration of Operating License)

Reference: STS 6.10.2.n

10. TS 15.6.10.I

Existing Item: "Records of radiation exposure of all plant personnel, including all contractor personnel and visitors who enter radiation control areas in the plant." (Permanent)

Proposed Change: "Records of radiation exposure of all individuals entering radiation controlled areas of the plant, including records for preparation of NRC-4 forms, bioassay and whole body counting results, and records of individual exposures exceeding 40-MPC hour limits, including evaluations and actions taken." (Duration of Operating License)

Reference:

- a. STS 6.10.2.c
- b. 10 CFR 20.102(c)
- c. 10 CFR 20.103(b)(2)
- d. 10 CFR 20.401(c)(1)

11. TS 15.6.10.J

Existing Item: "Records of radioactivity in liquid and gaseous wastes released to the environment and dilution of these wastes." (Permanent)

Proposed Change: "Records of gaseous and liquid radioactive material released to the environment." (Duration of Operating License)

Reference:

- a. STS 6.10.2.d
- b. 10 CFR 20.401(c)(3), (4), and (5)

12. TS 15.6.10.K

Existing Item: "Records of any special reactor tests or experiments." (6 years)

Proposed Change: (Duration of Operating License)

Reference:

- a. STS 6.10.2.f
- b. 10 CFR 50.59(b)

13. TS 15.6.10.L

Existing Item: "Records of changes made in the Operating Procedures." (6 years)

Proposed Change: (5 years)

Reference: STS 6.10.1.e

14. TS 15.6.10.M

Existing Item: "Test results, in units of microcuries, for leak tests performed pursuant to Specification 15.4.12." (6 years)

Proposed Change: "Records of sealed source and fission detector leak tests and results performed pursuant to Specification 15.4.12, including annual physical inventory results verifying accountability of sources." (5 years)

Reference: STS 6.10.1.g

15. TS 15.6.10.N

Existing Item: "Records of annual physical inventory verifying accountability of sources subject to Specification 15.4.12." (6 years)

Proposed Change: Delete this item due to being included in TS 15.6.10.M.

16. TS 15.6.10.O

Existing Item: "Records of training and qualification for current plant NRC licensed staff and key personnel." (Permanent)

Proposed Change: "Records of training, qualification and requalification for NRC licensed personnel shall be retained for two years per 10 CFR 55 requirements. Records of fire brigade member training, including drill critiques, shall be maintained for three years in accordance with 10 CFR 50 Appendix R, Section I.4 requirements."

Reference:

- a. 10 CFR 55, Appendix "A", Item 5.a
- b. 10 CFR 50, Appendix R, Item I.4

17. TS 15.6.10.P

Existing Item: "Records of in-service inspections performed pursuant to these Technical Specifications." (Permanent)

Proposed Change: (Duration of Operating License)

Reference: STS 6.10.2.h

18. TS 15.6.10.Q

Existing Item: "Records of Quality Assurance activities required by the QA Manual." (Permanent)

Proposed Change: "Records of quality assurance activities required by the QA manual shall be maintained for the duration of the Operating License except those QA records relating to radioactive materials shipping packages, which shall be maintained for the lifetime of the packaging per 10 CFR 71.91(c) requirements."

Reference:

- a. STS 6.10.2.i
- b. 10 CFR 50 Appendix A.I, Criterion 1
- c. 10 CFR 71.91(c)

19. TS 15.6.10.R

Existing Item: "Records of reviews performed pursuant to 10 CFR 50.59." (Permanent)

Proposed Change: "Records of reviews performed for changes made to procedures or equipment, or reviews of tests and experiments pursuant to 10 CFR 50.59 and as required per Specification 15.6.5.1.6." (Duration of Operating License)

Reference:

- a. STS 6.10.2.j
- b. 10 CFR 50.59(b)

20. TS 15.6.10.S

Existing Item: "Records of meetings of the Manager's Supervisory Staff and the Off-Site Review Committee." (Permanent)

Proposed Changes: (Duration of Operating License)

Reference:

- a. STS 6.10.2.k

21. TS 15.6.10.T

Existing Item: "Records of Environmental Qualification which are covered under the provisions of paragraph 15.6.12." (Permanent)

Proposed Change: Delete this specification.

Reference: Provisions of this specification are covered under specifications "B" and "D". The "permanent" retention period is unduly more restrictive than the requirements of 10 CFR 50.49(j) which stipulate that such records be retained for the "life of the item installation or the period where it is stored for future use".

22. TS 15.6.10.U

Existing Item: "Records of the service life of all snubbers in accordance with Specification 15.4.13.4." (Permanent)

Proposed Change: Delete this specification. The provisions of this specification are covered in specifications "B" and "D" discussed earlier. In addition, there is no reason to specifically emphasize snubber records over other safety-related equipment records.

23. TS 15.6.10.V

Existing Item: "Records of Analyses for radiological environmental monitoring." (Permanent)

Proposed Change: (Duration of Operating License)

Reference: STS 6.10.2.n

The items of TS 15.6.10 are relabelled as a result of the proposed deletions. In addition, it is proposed that the following specifications be added to Specification 15.6.10:

1. TS 15.6.10.U

Records of radioactive material shipments having a specific activity of greater than 0.002 microcurie/gram shall be retained for a period of two years in accordance with 10 CFR 71.91(a).

2. TS 15.6.10.V

Records concerning the Security Plan, procedures, testing, maintenance, and audit shall be maintained in accordance with the Commission-approved Point Beach Nuclear Plant Modified Amended Security Plan.

In addition to these changes, we are requesting several changes which are administrative in nature. They are identified by Technical Specification number and are as follows:

1. TS 15.6.3.2, 15.6.3.3, 15.6.5.1.2, and Figure 15.6.2-2

Changes to these specifications and figure result from Point Beach Nuclear Plant staff reorganization. This reorganization consisted of elimination of the position of Superintendent-Chemistry & Health Physics. The change also would designate the position of Radiochemist as being a regular member of the Point Beach Manager's Supervisory Staff.

2. TS 15.3.3.C.2.b

This specification is provided with a footnote allowing an exemption from the specification during the Unit 1 fall 1983 refueling outage. The exemption is no longer necessary and the footnote is removed.

3. TS 15.6.9.2.F

The specification has been rewritten to remove ambiguity existing in the present wording.

4. TS 15.6.9.1.B.2.a

The proposed change corrects an erroneous reference to another specification.

5. Table 15.3.5-5, Item No. 4

The No. of Channels parameter for the Reactor Coolant System Subcooling Instrumentation has been changed from 1 to 2 to reflect the present configuration.

6. Table 15.3.5-5, Item Nos. 7 and 13

The proposed changes correct erroneous references to other specifications.

7. TS 15.4.5, Basis, P. 15.4.5-4

A portion of the Basis has been rewritten for clarification.

8. TS 15.7.8.1

"Responsibilities" of the Manager's Supervisory Staff is changed to "duties". This is done for compatibility with the referenced specification. The referenced specification has also been corrected.

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9. TS 16.5

The proposed change corrects an erroneous reference to another specification.

10. TS 15.4.4.III.B

The proposed change corrects an erroneous reference to another specification.

The following pages of the Technical Specifications contain errors in spelling or punctuation which have been corrected in our proposed revision: 15.3.1-15, 15.3.2-3, 15.3.10-6, 15.3.12-1, 15.3.13-2, 15.4.4-7, 15.4.4-11, 15.4.15-3, and 15.6.12-1.

Lastly, the following pages refer to the "FFDSAR". This revision will change those references to "FSAR": 15.1-2, 15.3.1-14A, 15.4.6-2, 15.6.9-1, and 15.6.10-1.

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. 10 CFR 50.92(c) states that a proposed amendment involves no significant hazards consideration if operation of the facility in accordance with the proposed amendment would not: 1) involve a significant increase in the probability or consequences 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. The changes proposed in this amendments application are purely administrative in nature and have no impact on plant systems or accident analyses. Therefore, we conclude that the proposed specifications do not involve a significant hazards consideration.

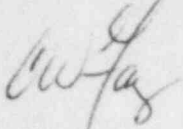
We have enclosed a check for \$150. This check is submitted in accordance with 10 CFR 170.21 as the fee for an amendments application.

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

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

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Enclosures (Check No. 900261)

Subscribed and sworn to before me
this 11th day of April 1986.


Notary Public, State of Wisconsin

My Commission expires May 7, 1986.

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

