Docket Nos. 50-266 and 50-301

Mr. C. W. Fay, Vice President Nuclear Power Department Wisconsin Electric Power Company 231 W. Michigan Street, Room 308 Milwaukee, Wisconsin 53201

Dear Mr. Fay:

SUBJECT: TECHNICAL SPECIFICATION CHANGE REQUEST NUMBER 108-TACS 61308 AND 61309

In a letter dated April 10, 1986, you submitted an application for amendments to the operating licenses of Point Beach, Units 1 and 2. The purpose of these amendments was to incorporate into the licenses changes to Technical Specification 15.6.10, "Plant Operating Records," as well as numerous changes to other technical specifications.

We have completed our review of the proposed amendments. Based on this review, we have generated a number of comments/concerns which must be resolved. These concerns are detailed in the Enclosure to this letter.

We request that you review these comments and revise your application for amendments accordingly. Do not hesitate to call us if you have any questions concerning this request.

Sincerely,

David H. Wagner, Project Manager Project Directorate III-3 Division of Reactor Projects

Enclosure: As stated

cc: See Next Page

Cffice: LA/PDIII-3 Surname: PKreutzer Date: 04/y/87 PM/PDIII-3 DWagner/tg 04/5/87 PD/PDIII-3 DWigginton 05/5/87

8705140011 870505 PDR ADOCK 0500026 Mr. C. W. Fay Wisconsin Electric Power Company

Point Beach Nuclear Plant Units 1 and 2

cc: Mr. Bruce Churchill, Esq. Shaw, Pittman, Potts and Trowbridge 1800 M. Street, N.W. Washington, DC 20037

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POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

COMMENTS ON TECHNICAL SPECIFICATION CHANGE REQUEST

NUMBER 108, DATED APRIL 10, 1986

- 1. The proposed change relating to record retention of training and qualification for current NRC-licensed staff and key personnel, specifically TS 15.6.10.0, does not reflect a recent revision to 10 CFR 55 (which was approved after the amendment requests were submitted). The new 10 CFR 55, which becomes effective on May 26, 1987, requires that records be retained until the operators' license is renewed. (For additional information, see the March 25, 1987, Federal Register (52 FR 9468)).
- 2. The current TS 15.6.10.0 addresses records for current plant NRC-licensed staff and key personnel. "Key personnel" is not defined in the specification; therefore, it cannot be determined if the proposed revision envelops the specification in place.

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