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VPNPD-87-295  
NRC-87-72

July 17, 1987

U. S. NUCLEAR REGULATORY COMMISSION  
Document Control Desk  
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
MODIFICATION TO TECHNICAL SPECIFICATION CHANGE REQUEST 108  
RECORDS RETENTION AND ADMINISTRATIVE CHANGES  
(TAC'S 61308 AND 61309)  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Our letter dated April 10, 1986, requested license amendments to Point Beach Nuclear Plant, Units 1 and 2, to incorporate changes to Technical Specification 15.6.10, "Plant Operating Records", as well as numerous changes of an administrative nature to other specifications. A letter from Mr. D. H. Wagner of your staff dated May 5, 1987, indicated that review of our request is complete; however, it also listed some items of concern to be resolved before the amendment can be issued. Mr. Wagner also identified other items of concern, minor in nature, through informal discussion with Mr. C. W. Krause of our licensing staff. This submittal addresses those concerns and amends our original request.

The two items of concern stated in the May 5, 1987 letter are listed below, followed by our response.

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."

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Response:

We have reviewed the revision to 10 CFR 55 and have altered our proposed wording of old TS 15.6.10.0 (which would now become 15.6.10.N) to be consistent with the regulation. (See new TS 15.6.10.N on Page 15.6.10-2, attached.)

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."

Response:

Since the specifications do not, in fact, define the term "key personnel", we have deleted this terminology from the proposed specification. The specification as now proposed is consistent with the NRC regulations at 10 CFR 55.

Two items of concern were identified which resulted from the issuance of amendments to pages which were part of our April 10, 1986, submittal. Amendment 102 to DPR-24 and Amendment 105 to DPR-27, dated June 27, 1986, deleted TS 15.6.9.2.D. As a result, TS 15.6.9.2.E and 15.6.9.2.F were relabeled 15.6.9.2.D and 15.6.9.2.E, respectively. Our original submittal proposed a change to TS 15.6.9.2.F. Our proposed specification (Page 15.6.9-5, attached) is now labeled properly as 15.6.9.2.E.

Similarly, Amendment 105 to DPR-24 and Amendment 108 to DPR-27, dated February 2, 1987, changed TS 15.3.3.C due to a modification which installed an additional heat exchanger in the Component Cooling System. Our April 10, 1986, submittal proposed the removal of a footnote to that specification which had become moot with the passage of time. The February 2, 1987, amendments, however, removed the footnote. The change to TS 15.3.3.C.2.b requested in our original submittal is, therefore, no longer needed.

Another problem identified is the reference provided as justification for modifying the retention period of records of off-site environmental surveys and analyses for radiological environmental monitoring (TS 15.6.10.H and TS 15.6.10.V). The reference we previously provided you (Westinghouse Standard Technical Specifications [STS], Revision 4, Section 6.10.2.n) does not exist. The reference provided does, however, exist in the draft of Revision 5 to the Westinghouse STS. We do not



wish to modify our proposed change to the specifications. The change we are proposing would alter the retention period of these records from "Permanent" to "Duration of Operating License". This is consistent with other changes to Specification 15.6.10, and with the intent of STS Section 6.10.1 that records designated for long-term vice short-term retention should be retained for the duration of the Unit Operating License and not, as in our existing specifications, permanently.

Lastly, there is a question concerning the record of dilution of radioactive waste. Our revision to TS 15.6.10.J proposes two changes from the existing specification. The first is a reduction in retention period from "permanent" to "duration of operating license", consistent with the Standard Technical Specifications. The second removes the requirement to retain records of dilution of radioactive wastes released to the environment. The concern is that while the proposed change relative to dilution is consistent with STS 6.10.2.d, it is not consistent with Regulatory Guide 1.21, Appendix A, Section B, which stipulates that records of dilution, as well as activity release, be retained.

We agree that the specification should address dilution of radioactive effluents. While verbatim agreement with the Standard Technical Specifications is not achieved, consistency with Regulatory Guide 1.21 and with our own TS 15.7.8.4.A is achieved. TS 15.7.8.4.A outlines RETS Reporting Requirements in the Semiannual Monitoring Report, specifying the reporting of the volume of dilution water used in radioactive liquid releases to the environment. We, therefore, have revised our proposed TS 15.6.10.J to include records of waste dilution (Page 15.6.10-2, attached).

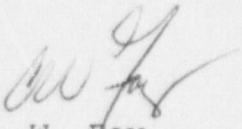
As required by 10 CFR 50.90(A), we have evaluated this modification to our April 10, 1986, submittal in accordance with the standards specified in 10 CFR 50.92 to determine if the proposed changes constitute a significant hazards consideration. A proposed amendment involves no significant hazards consideration 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.

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Upon examination of the administrative nature of these changes, there is nothing in their content which could have an effect on a previously analyzed accident, create a new or different accident, or cause a significant reduction in a margin of safety. They either relate to records retention or correct administrative errors. We, therefore, conclude that no significant hazards consideration exists for this modification to our April 10, 1986, submittal.

Please contact us at once if you have any questions concerning this request.


Very truly yours,

  
C. W. Fay  
Vice President  
Nuclear Power

Enclosures

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector  
R. S. Cullen, Public Service Commission of Wis.

Subscribed and sworn to before me  
this 20<sup>th</sup> day of July, 1987.

  
Notary Public, State of Wisconsin  
My Commission expires 5-27-90.