

December 20, 1979

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

Attention: Mr. A. Schwencer, Chief Operating Reactors Branch 1

Gentlemen:

Sol Burstein

DOCKET NOS. 50-266 AND 50-301 REACTOR CAVITY ANNULUS SEAL RING POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated October 2, 1979, requested that we either demonstrate by appropriate analysis that the reactor cavity annulus seal ring cannot become a destructive missile in the event of a LOCA pipe break inside the reactor cavity or furnish a statement that the seal ring will be removed by the next refueling outage.

We had maintained, based on equipment arrangement at the Point Beach Nuclear Plant, that even if the seal ring became a missile, it could not impact or affect any safety-related components located in the containment. We still believe this to be true; however, the cost of an "appropriate analysis" to satisfy the NRC would be excessive. Therefore, we shall remove the seal ring following each refueling outage. This removal will be effected by raising the ring to more than twelve feet above the cavity floor. This modification will be completed at the next refueling outage for each unit. The plant procedures addressing preparation for and recovery from refueling, RP-1A and RP-1B respectively, will be revised to reflect this commitment.

Very truly yours,

1649 307

Executive Vice President

Subscribed and sworn to before me this 20th day of December 1979.

Notary Public, State of Wisconsin

My Commission expires July 6, 1980.

7912280 0

A039