

February 26, 1979

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

Dear Mr. Denton:

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## POINT BEACH NUCLEAR PLANT UNIT 2 INSERVICE INSPECTION PROGRAM FOR SAFETY CLASS COMPONENTS

On February 12, 1976, the Commission published in the Federal Register a notice concerning a revision to 10 CFR 50 Section 50.55a which changed the basis for inservice inspection and testing requirements for safety class components of nuclear power plants. The revised regulation requires that all nuclear power facilities meet, to the extent practical, the inservice inspection and testing requirements of Section XI of the ASME Boiler and Pressure Vessel Code, as specified in 10 CFR 50.55a paragraph (b). Licensees are required to update their inservice inspection program prior to each 40 month inservice inspection interval and update the pump and valve testing programs every 20 months. The Commission's letters of April 26, 1976 and November 22, 1976, provided further guidance and clarification concerning these requirements. We have completed this update and are providing herewith ten copies of our revised inservice inspection and testing program.

By letter dated November 27, 1978, Wisconsin Electric Power Company (Licensee) in the above named docket, submitted to the Commission a license amendment request for technical specification changes necessitated by these revised inservice inspection and testing requirements. The inservice inspection program for Point Beach Nuclear Plant Unit 2 is in accordance with the 1974 edition of Section XI of the ASME Boiler and Pressure Vessel Code using the Summer 1975 Addenda. The program consists of three sections; Section 1 specifies the pump and valve inservice testing program, Section 2 specifies the inservice requirements for pressure vessel and pressure containing piping examinations, and Section 3 contains drawings and figures to support the material provided in sections 1 and 2.

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The Commission regulations presented in 10 CFR 50.55a subparagraph g (5) (iii) allow the Licensee to determine whether or not conformance to the required Code is practical. Licensees have determined that conformance with certain code requirements for some safety class components is not practical for our existing facility. We have identified those specific components and tests which we have determined are impractical and submitted information to support this determination in the attached program. It is requested that per 10 CFR 50.55a g (6), licensees be granted relief from these portions of code requirements. In those instances in which we have determined that the ASME Section XI Code requirements are impractical, we have specified other inservice inspection or testing that will be performed in lieu of the code requirements, which we believe will provide adequate assurances of system or component integrity.

The periodic inspection interval for which this inservice inspection and testing program has been prepared will begin on June 1, 1979. We plan to initiate the Point Beach Nuclear Plant Unit 2 inservice inspections in accordance with the attached program at that time. Should you have any questions regarding the attached program or require additional clarification or details, please contact us.

Very truly yours,

Sol Burstein

Attachments

Executive Vice President