

UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D. C. 20555

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APR 03 1980

Docket Nos. 50-301
50-266

Mr. Sol Burstein
Executive Vice President
Wisconsin Electric Power Company
231 West Michigan Street
Milwaukee, Michigan 53201

Dear Mr. Burstein:

On October 30, 1979, a letter was issued to each power reactor licensee which provided additional clarification on the requirements (outlined in NUREG-0578) which resulted from the NRC staff investigations of the TMI accident. As a result of discussions with members of your staff (site visit 3/4/80; telecons 2/25/80, 3/26/80, and 3/28/80), the following is submitted to further clarify the staff's position on containment isolation (Section 2.1.4 of NUREG-0578).

As stated in NUREG-0578, the purpose of this requirement is "...to ensure that effective containment isolation is accomplished and maintained." NUREG-0578 also references General Design Criterion 54 of Appendix A to 10 CFR Part 50 which requires that containment capabilities be provided which have "...redundancy, reliability, and performance capabilities which reflect the importance to safety of isolating these piping systems."

Position 3 of Section 2.1.4 of the NRC staff letter dated 10/30/79 states, "All non-essential systems shall be automatically isolated by the containment isolation signal." To meet this position, all plants are required to have double isolation barriers without the need for operator action. Point Beach does not meet this position on two penetrations:

1. Seal water return line.
2. Auxiliary charging line.

In order to meet position 3, remote manual valves on the seal water return line must be modified to automatically isolate on diverse, safety-grade isolation signals or a diversely-actuated automatic isolation valve should be added to this line. Manual valves in the auxiliary charging line must be either sealed closed or modified to close on diverse, safety-grade, automatic isolation signals.

Position One of Section 2.1.4 of the staff letter dated 10/30/79 states that there shall be "...diversity in the parameters sensed for the initiation of containment isolation."

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The October 30, 1979 letter further specified that the diverse isolation signals must satisfy safety-grade requirements. Although the NRC staff has not specified which parameters must be sensed, the parameters should provide early initiation of containment isolation.

The following penetrations do not meet this position:

1. Letdown line
2. Steam generator sample lines
3. Steam generator blowdown lines

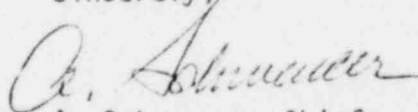
In order to meet the Lessons Learned requirement, diverse, safety-grade isolation signals must be provided to the valves in these systems which currently isolate on only one isolation signal. High radiation is acceptable as one of the diverse parameters provided that the signal is derived from safety grade channels.

In the interim, until the modifications required to meet the above two positions have been completed, all penetrations in the above five systems must be administratively controlled by approved procedures such that they are manually isolated promptly upon receipt of a valid (i.e., non-spurious) safety injection signal.

In addition, Point Beach has several other penetrations not discussed above which contain "normally closed" manual containment isolation valves (e.g., sample lines). These penetrations must be administratively controlled such that at any time they are opened during normal operation (i.e., times other than cold shutdown or refueling), a dedicated person is assigned to promptly close these valves in the event of an emergency or as soon as the operation is complete. The staff believes that this measure provides adequate assurance that a double isolation barrier will be maintained.

For Point Beach to be in compliance with all short term TMI Lessons Learned requirements, it is required that you 1) immediately implement the administrative controls specified above, and 2) provide a commitment and schedule demonstrating that all necessary system modifications will be implemented as soon as equipment can be procured.

Sincerely,



A. Schwencer, Chief
Operating Reactors Branch #1
Division of Operating Reactors

cc: See Page 3

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