



Wisconsin Electric POWER COMPANY
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May 2, 1980

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

Dear Mr. Denton:

DOCKET NOS. 50-266 AND 50-301
IMPLEMENTATION OF NUREG-0578
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

Attached is our response to the letter of April 3, 1980, from Mr. A. Schwencer to Mr. Sol Burstein which clarified the NRC Staff position on Section 2.1.4 of NUREG-0578. The attachment specifically addresses each item of the requirements present in the letter.

Administrative controls for each of the five systems identified were immediately implemented to ensure that all related penetrations would be isolated, with double isolation barriers, upon receipt of a valid (i.e., non-spurious) safety injection signal. The commitments and schedule will provide each system with automatic double barrier isolation by diverse signals. The installation will occur at or before the next scheduled refueling outage for the unit.

Procedures have been modified to ensure that "normally closed" manual containment isolation valves are administratively controlled such that they would be promptly closed by a dedicated person in the event of an emergency, if the valves should be opened at any time during normal operation.

To the best of our knowledge, this addresses all remaining items which were under discussion relative to implementation of Category "A" Lessons Learned requirements at Point Beach Nuclear Plant Units 1 and 2.

Very truly yours,

C. W. Fay, Director
Nuclear Power Department

Attachment

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2.1.4 CONTAINMENT ISOLATION

Interim Implementation

Until the final system equipment modifications are completed the following administrative controls have been implemented via the Point Beach Nuclear Plant, Operations Group, Special Order 80-13 (April 16, 1980):

1. Manual isolation of the following systems immediately following a containment isolation resulting from a valid safety injection:
 - a. Seal water return - close or check closed:
 1. Excess letdown line - valve MOV-285.
 2. RCP seal bypass line - valve CV-386.
 3. RCP seal return line - valves 315A* and 315C*.
 4. RCP seal outlet lines - valves MOV-270A and MOV-270B if and only if RCP's have been secured.
 - b. Auxiliary charging line - close valve CVCS-323A*.
 - c. Letdown line - close valve LCV-427 and/or AOV-200A, B, C.
 - d. Steam generator blowdown lines - close valves CV-2042 and CV-2045.
 - e. Steam generator sample lines - close valves CV-2083 and CV-2084.
 - f. Primary sample lines - close or check closed (valves CV-966A, B, & C are outside containment and receive a containment isolation ("T") signal):
 1. Pressurizer vapor space - valves CV-951* and CV-966A.
 2. Pressurizer liquid space - valves CV-953* and CV-966B.
 3. Hot leg sample line - valves CV-955* and CV-966C.
- *Manual valves or operated from the primary auxiliary building.
2. In addition to the above normally used lines, any system interfacing the containment with administratively shut or locked integrity valves, which must be opened to perform a given at power evolution will have a designated person assigned to promptly reclose the opened valve following a containment isolation resulting from a valid safety injection. The

designated person will be properly relieved for shift changes and recorded in the appropriate watch turnover logs. This administrative control on normally closed systems is the long-term implementation to meet NRC requirements on this item.

Final Implementation

1. Automatic Isolation of Non-Essential Systems

a. Seal water return line.

A new valve will be purchased and installed inside containment downstream of the seal water return line relief to the PRT. Automatic isolation will be provided on a "T" signal (containment isolation signal actuated manually or by a safety injection signal - diverse).

Installation will occur as soon after receipt of equipment as possible but no later than the next scheduled refueling for each unit after receipt.

b. Auxiliary charging line.

Valve CV-1296 currently serves as a relief valve protecting the RCP seals from overpressure should the normal charging path be isolated. Valve CVCS-323A will be administratively controlled until it can be verified by the RCP vendor whether this protection is needed. If it is not needed, then CVCS-323A will be locked closed. If it is needed, then a new valve will be purchased to replace CVCS-323A and provide automatic containment isolation ("T" signal) and maintain the relief capability. This determination will be completed by July 1, 1980.

2. Diversity of Isolation Signals to Automatic Valves

a. Letdown line.

A new valve will be purchased and installed inside containment downstream of the letdown orifice block valves and letdown line relief to the PRT. An automatic isolation will be provided on a "T" signal.

Installation will occur as soon after receipt of equipment as possible but no later than the next scheduled refueling for each unit after receipt.

b. Steam generator sample lines (one valve per loop) and steam generator blowdown lines (one valve per loop).

The containment isolation ("T") signal will be provided to these valves. No change in the testing of these valves relative to 10 CFR50 Appendix J will be made as a result of this change.

This change will be completed as soon as possible prior to January 1, 1981.

- c. Primary system sample lines (pressurizer vapor space, pressurizer liquid space, and RCS hot leg).

The containment isolation ("T") signal will be provided to the normally closed inside containment valves on these systems; valves CV-951, CV-953, and CV-955 respectively.

This change will be completed as soon as possible prior to January 1, 1981.