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May 18, 1981

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

Attention: Mr. Robert A. Clark, Chief
Operating Reactors Branch 3

Gentlemen:

DOCKET NO. 50-266
PRIMARY COOLANT SYSTEM PRESSURE ISOLATION VALVES
POINT BEACH NUCLEAR PLANT, UNIT 1

On May 5, 1981, we filed a request with your office for an extension of the thirty-day operating period established in the NRC's Order for Modification of Licenses dated April 20, 1981, for Point Beach Nuclear Plant Unit 1. This extension would permit operation of Point Beach Unit 1 until the cold shutdown outage presently scheduled for June 1981. We filed this request because, by our interpretation of the April 20, 1981 Order requirements, we had not individually tested the pressure isolation check valves in the high and low pressure safety injection lines and established for each individual check valve that the leakage rate criteria of the Technical Specifications attached to the April 20, 1981 Order had been met. We based our request for extension on the testing done in December 1980 which had demonstrated the check valves to be seated, without determining a specific individual valve leakage rate, and subsequent surveillance which provided appropriate confidence that the leak-tight integrity of these check valves continued to be maintained.

Subsequent to our request, members of your Staff and the Point Beach NRC Resident Inspector have investigated the documentation we provided regarding the December 1980 testing of these valves and the subsequent checks we have conducted to establish the continued leak-tight integrity of the check valve in the high pressure safety injection system. We understand that based on your examinations of data, the leakage rate of these check valves is considered to be bounded by the permissible leakage rate criteria of the Technical Specifications and the intent of the April 20, 1981 Order has been satisfied for the high

APR 27/81

May 18, 1981

pressure safety injection system pressure isolating check valves. Specifically, the valves in question are 867 A and B, and 845 A, B, E, and F.

The remaining check valves discussed in the April 20, 1981 Order, specifically 853 A, B, C, and D, and 845 C and D in the low pressure injection and core deluge systems are, and have been, backed up by normally closed motor-operated valves (MOV's). In accordance with the instructions of the April 20, 1981 Order, quarterly inservice inspection cycling of these MOV's will be suspended until the check valve tests have been satisfactorily accomplished. The plant operators will be instructed and administrative controls implemented to assure these MOV's remain closed. The MOV's will be tagged closed to further preclude inadvertent valve opening. This action will be completed before May 19, 1981.

We must advise, however, that we have some concern with this directive. We are unaware of any evaluation that you or others may have made concerning the potential for check valve leakage as compared to the potential for motor-operated gate valve failure to open when required in the absence of quarterly cycling operability tests. While we are aware of a number of instances where motor-operated valves failed to operate because of limit or torque switch problems, for example, we have not seen similar frequency of excessive check valve leakage.

Accordingly, we believe, based on the interpretation of testing and surveillance information available, that the provisions of the April 20, 1981 Order for Modification of Licenses have been satisfied. Our letter dated May 5, 1981 for extension of the operating period for Point Beach Nuclear Plant Unit 1 should be withdrawn. The appropriate individual leakage rate testing and surveillance of the Point Beach Unit 1 check valves will be accomplished at the next cold shutdown.

Very truly yours,

C. W. Fay, Director
Nuclear Power Department

Copy to NRC Resident Inspector