



Wisconsin Electric POWER COMPANY
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June 9, 1981

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

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

Gentlemen:



DOCKET NOS. 50-266 AND 50-301
REDUCED TIME DURATION OF
CONTAINMENT INTEGRATED LEAK RATE TESTS
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

During a routine inspection conducted by Messrs. D. L. Robinson and I. N. Jackiw of the Nuclear Regulatory Commission, Region III Inspection & Enforcement Office, on February 24-25, 1981, Mr. I. N. Jackiw brought to our attention that containment integrated leak rate test periods of less than 24 hour durations are currently under review by the Commission. Mr. Jackiw also informed us that until an NRC position is established and communicated to all licensees, the acceptability of reduced duration tests will be judged on a case-by-case basis. This information was reiterated in the written report of the inspection in Mr. C. E. Norelius' letter dated March 17, 1981.

In view of our upcoming Unit 1 containment integrated leak rate test scheduled for October, 1981, we are confirming our position on the reduced duration containment integrated leak rate test period. Please note that our position on this matter was previously transmitted to you in our letter to Mr. Denton dated February 25, 1981, which provided a response to your request for additional information relating to Technical Specification Change Request No. 28 dated January 27, 1981.

It is our position that the reduced duration containment integrated leak rate tests performed at the Point Beach Nuclear Plant provide a viable means of determining, accurately and reliably, the quality of containment integrity. In accordance with the Point Beach Technical Specification, Section 15.4.4.1.A.2, "The test duration shall not be less than 24 hours unless test experience of at least two prior tests provide evidence of the adequacy of the shorter test duration". This evidence is apparent in our

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Mr. H. R. Denton

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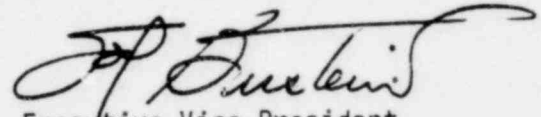
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previous containment integrated leak rate testing. In addition, procedural constraints have been applied in the previous tests that allow the test duration to be reduced to no less than eight hours only if there is evidence of a 95% certainty that the leakage rate is within allowable limits. It is our intention to apply these procedural constraints to the future containment integrated leak rate tests that may qualify for a reduced duration test period.

It should be noted also that the reduced duration, as well as the full duration, containment integrated leak rate tests performed at the Point Beach Nuclear Plant are conducted in accordance with the duration requirements of Appendix J to 10 CFR Part 50 and ANSI N45.4 - 1972.

The present uncertain interpretation of federal regulations and referenced standards continues to cause problems. We are planning to conduct our future containment integrated leak rate testing in the same manner as we have in the past. We recommend an early completion of any Commission review and coordination between the Office of Inspection & Enforcement and the Office of Nuclear Reactor Regulation in providing guidance to licensees.

Very truly yours,


Executive Vice President

So! Burstein

Copy to: NRC Resident Inspector
Point Beach Nuclear Plant