



Wisconsin Electric POWER COMPANY

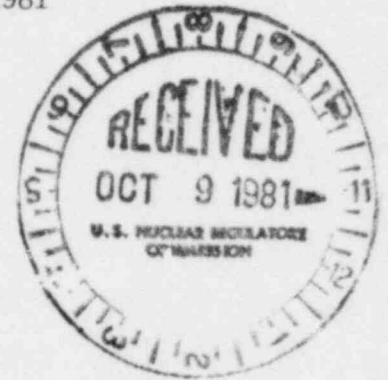
231 WEST MICHIGAN, MILWAUKEE, WISCONSIN 53201

October 2, 1981

Mr. Harold 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
FIRE PROTECTION MODIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2



This letter is to provide the current status of fire protection items for the Point Beach Nuclear Plant.

Our March 18, 1981 letter pursuant to 10 CFR Part 50.12(a) requested extension of certain of the schedule dates in Paragraph (c) of the fire protection regulations in 10 CFR Part 50.48. In particular we requested:

1. That the date in Paragraph (c)(5) for submitting plans and schedules for meeting the provisions of Paragraph (c)(2), (c)(3), and (c)(4) with respect to the requirements of Section III.G of Appendix R to Part 50 be extended from March 19, 1981 to September 30, 1981, and with respect to the requirements of Section III.O of Appendix R to Part 50 be extended to June 30, 1981.
2. That the date in Paragraph (c)(5) for submitting design descriptions of modifications needed to satisfy Section III.G.3 of Appendix R be extended from March 19, 1981 to December 31, 1981.
3. That the implementation date in Paragraph (c)(2) for installation of modifications that do not require prior NRC approval or plant shutdown be extended from nine months after February 17, 1981 to nine months after September 30, 1981 for modifications required by Section III.G, and to nine months after June 30, 1981 for modifications required by Section III.O.
4. That the implementation date in Paragraph (c)(3) for the installation of modifications that do not require prior NRC approval but require plant shutdown be extended from before startup after the earliest of the specified events commencing 180 days or more after February 17, 1981 to before startup after the earliest of the specified events commencing 180 days or more after September 30, 1981 for modifications required by Section III.G, and to before startup after the earliest of the specified events commencing 180 days or more after June 30, 1981 for modifications required by Section III.O.

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Our letter also provided the basis for the listed schedule extension requests. Although the requested extension dates appeared to be reasonable at the time of our request, our subsequent efforts to satisfy these dates have proven them to be optimistic and unachievable. Our basis addressed the problem of coordinating the design and implementation of fire protection features with the many other tasks required by the Commission. The availability of cognizant personnel to perform fire protection tasks in addition to the other necessary safety-related tasks was also a recognized problem. We did not anticipate the significant impact of the large work force necessary to implement the many required modifications in an operating nuclear power plant.

Engineering and implementation are proceeding within the limits of our personnel availability and at a work pace which can be accommodated safely at the plant. The following itemized information is provided:

Reassessment of Plant Design Features For Meeting the Requirements of Sections III.G, III.J, and III.O of Appendix R.

Our March 18 letter described the reassessment in accordance with Section III.G as a five step evaluation which we expected to complete by September 30, 1981. To date, all necessary shutdown equipment and cables have been identified. We are currently in the process of evaluating each plant area for the purpose of developing suitable plans to comply with Section III.G. We believe that this work can be completed by December 31, 1981 and that plans and schedules for implementation can be submitted by January 31, 1982.

All modification work necessary to meet the requirements of Section III.G is not being delayed until completion of the reassessment. A specification for automatic suppression systems in the cable spreading, switchgear, and auxiliary feedwater pump rooms will be issued shortly. Contractor selection is expected by October 31, 1981 and implementation will proceed when system components have been procured. We have developed an equipment barrier design and fabrication details are presently being prepared. We will proceed to implement these barriers as the reassessment evaluation indicates their necessity. We will also proceed with implementation of additional fire suppression systems in the auxiliary building if our plant area evaluation indicates their necessity.

Our March 18 letter stated that a plant inspection was required to determine the plans necessary to comply with Section III.O. The inspection was performed as scheduled. However, the development of plans and schedules could not be completed by June 30, 1981. A design has been developed for reactor coolant pump oil collection including the high pressure lift pump and piping. The design is presently undergoing final plant staff review. We presently plan to have one pump collection system fabricated following plant approval. The assembly will require plant fit-up and perhaps modification before all reactor coolant pump oil collection systems can be fabricated. Because of the heavy work load during the approaching Unit 1 refueling outage including containment fire detector installation, we are not confident that the Unit 1 reactor coolant pump oil collection systems can be installed during this outage. We

do believe that sufficient work can be accomplished to facilitate implementation of this modification within the period of our original request for a time extension.

We submitted plans and schedules for implementing modifications required by 10 CFR Part 50.48 (c) which were not specifically required to satisfy Sections III.G and III.O in a separate March 18, 1981 letter. The following significant status changes are noted for modifications as identified in the Fire Protection Evaluation Report:

1. Item 3.1.5 - Water Damage Protection

This item covered the requirement for floor drains in the cable spreading room. A closed head sprinkler system was initially considered to provide automatic fire suppression. Modifications necessary to accommodate water protection would include the floor drains, MCC spray shields, and transformer dikes for PCB containment. The cable spreading room automatic fire suppression will be a gaseous suppression system. Floor drains, spray shields, and transformer dikes will not be required. Floor drains would in fact be detrimental as they would have to be provided with locked closed isolation valves to assure containment of an adequate concentration of suppressant, as well as for PCB containment. Manual water suppression capability is provided with the water source located outside of the cable spreading room. Water suppressant can only be introduced through an open entrance door which thereby also provides drainage capability. Overall fire protection of the cable spreading room is more suitably provided without floor drains which, therefore, will not be installed.

2. Item 3.1.9 - Fire Barriers

All fire barrier penetration seal work except for the west wall of the auxiliary feedwater pump room and approximately four floor penetrations is complete. Approximately six weeks of work remains to be done. The auxiliary feedwater pump room seal work is interfaced with masonry wall requirements and post-TMI shielding requirements. It has not been possible to accomplish the necessary work prior to the approaching Unit 1 refueling. The multitude of tasks which must be accomplished during a refueling outage, supervisory personnel availability, and the physical capacity limitations of the plant dictate that unnecessary contract personnel be excluded from the plant during the refueling outage. Therefore, the remaining seal installation work has been postponed until the outage completion. Seal installation work is expected to be completed by March 1, 1982.

3. Item 3.1.24 - Diesel Generator Air Intake

This modification has been completed.

4. Item 3.1.31 - Emergency Diesel Generators - Remote Panel

This modification is being implemented by plant personnel because of the safety significance of the diesel generators. The installation

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of necessary equipment is essentially complete. However, electrical checkout and operating procedures have not been fully developed. The plant personnel responsible for developing the necessary procedures will be fully occupied with Unit 1 refueling outage activities between October 9 and December 5, 1981. Therefore, this modification cannot be completed by November 17, 1981. We expect to have this modification completed by January 31, 1982.

Your February 13, 1981 letter stated that the installation of fire detectors in Unit 1 containment was required during the fall 1981 refueling outage, in Unit 2 containment during the spring 1982 refueling outage, and in all plant areas which did not require an outage by October 21, 1981. Contractor availability and material delivery problems delayed initiation of this installation. At the present time, fire detector installation is one of the many modifications being implemented expeditiously at Point Beach Nuclear Plant. Detectors will be installed in Unit 1 containment during the refueling outage which begins October 9, 1981. Detectors will be installed in Unit 2 containment during the spring 1982 refueling outage. The balance of plant fire detector installation cannot be completed by October 21, 1981 but will be completed prior to the Unit 2 containment installation.

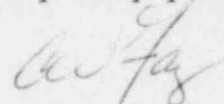
Enclosure 3 to your May 4, 1981 letter lists the following unresolved fire protection issues for Point Beach Nuclear Plant:

1. Item 3.1.14 - Cable Separation
2. Item 3.1.17 - Hydrogen Hazard Fire Protection
3. Item 3.2.1 - Safe Shutdown Capability
4. Item 3.2.2 - Circulating Water Pumphouse Fire Protection
5. Item 3.2.6 - Reactor Coolant Pump Lube Oil Collection

Plans and schedules for Issues 1, 2, and 3 will be covered by the plans and schedules which we will develop at the completion of our plant reassessment to meet the requirements of Section III.G of Appendix R. Our June 23, 1981 letter committed to the installation of a fire barrier wall to provide separation of the service water pumps in accordance with Section III.G to resolve Issue 4. The fabrication details for this barrier are in the process of preparation. We expect implementation of this modification to be completed by March 1, 1982. Our plans and schedules for Issue 5 are stated in our status description of plans necessary to comply with Section III.O.

Please advise us if you have any questions or require any additional information at this time.

Very truly yours,



C. W. Fay, Director
Nuclear Power Department

Copy to: NRC Resident Inspector