



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

October 27, 1982

Mr. H. 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 50-266
REQUEST FOR ADDITIONAL INFORMATION
POINT BEACH UNIT 1 STEAM GENERATOR REPLACEMENT

This is to provide further information, as requested by Mr. T. Colburn of your staff, regarding Quality Assurance (QA) programs described in the Point Beach Nuclear Plant Unit 1 Steam Generator Repair Report ("Repair Report"). As a matter of clarification, the Repair Report Section 2 describes the design and fabrication of replacement steam generators and Section 3 describes the on-site installation of the steam generators. The Regulatory Guides which are listed in Section 2.1.4 of the Repair Report are those which are applicable to design and fabrication. Those which are applicable to the installation are listed in Sections 3.6.3 and 3.6.4 of the Repair Report.

Mr. Colburn requested commitments to Regulatory Guides 1.39, 1.58, 1.88, 1.94, 1.144, and 1.146 for the steam generator replacement activities described in the Repair Report. The Repair Report will be revised to include commitments to the guidance of Regulatory Guides 1.58, 1.88, 1.144, and 1.146 as applicable to the design and fabrication of the replacement steam generators and Regulatory Guides 1.39, 1.58, 1.88, 1.94, 1.144, and 1.146 as applicable to the installation of the steam generators with the clarifications as noted in Attachment 1 to this letter. Clarifications of Regulatory Guides applicable to the design and fabrication of the replacement steam generators are also contained in WCAP-8370. Reference to WCAP-8370 will be made in Section 3.6.4 of the Repair Report, as requested by Mr. Colburn.

Mr. Colburn also requested submittal of WCAP-9245 for review. Westinghouse Electric Corporation is currently preparing a supplement to the WCAP-9245 (Revision 6). This supplement will specifically address steam generator replacement services. Wisconsin Electric will review and approve the Westinghouse program, including the supplement when it becomes available, in accordance with the Wisconsin Electric Quality Assurance Program, as indicated in Section 3.6.1, paragraph 2, of the Repair Report.

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Mr. H. R. Denton

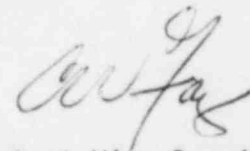
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October 27, 1982

WCAP-9245 (Revision 6) is attached as Attachment 2 for your information and use in the review of the QA programs as applicable to the Point Beach steam generator replacement activities. The supplemental document to WCAP-9245 (Revision 6) will be submitted for your information when it becomes available.

Should you have further questions regarding QA programs to be implemented for replacement of steam generators at Point Beach Nuclear Plant Unit 1, please contact us.

Very truly yours,



Assistant Vice President

C. W. Fay

Attachments

cc (w/Attachment 1): ASLB Service List
NRC Resident Inspector

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

Before the Atomic Safety and Licensing Board

In the Matter of)
)
WISCONSIN ELECTRIC POWER COMPANY) Docket No. 50-266-OLA2
)
(Point Beach Nuclear Plant,)
Unit 1))

SERVICE LIST

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Atomic Safety and Licensing
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Washington, D.C. 20555

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ATTACHMENT 1

ALTERNATIVE METHODS OF COMPLIANCE WITH SPECIFIC QA-RELATED STANDARDS

- a) Regulatory Guide 1.39, Rev. 2, 9/77, and ANSI N45.2-1973,
"Housekeeping During the Construction Phase of Nuclear
Power Plants"

Provisions of this regulatory guide and standard are incorporated within the QA program, as applicable. For on-site application of the QA programs and associated activities, Wisconsin Electric's approved and licensed QA requirements will take precedence should they conflict.

- b) Regulatory Guide 1.58, Rev. 1, 9/80, and ANSI N45.2.6-1978,
"Qualifications of Inspection, Examination, and Testing
Personnel for Nuclear Power Plants"

Provisions of this regulatory guide and standard are incorporated within the QA program, as applicable, with the following alternatives and clarifications:

1. Last paragraph, first sentence of Section 1.2, Applicability, "The requirements ... and consultants".

Clarification

The extent to which this standard applies to equipment suppliers depends on complexity and importance of the items being supplied. Where the provisions of the standard are needed, requirements are defined within procurement documents by reference to quality assurance system specifications or to supplier quality manuals. These documents prescribe measures so that inspections, tests, or examinations are performed by trained, proficient, and qualified personnel.

2. Levels of Capability (Regulatory Position C.6).

Requirement

- "6. Section 3.5, "Education and Experience Recommendations", of ANSI N45.2.6-1978 states that the education and experience specified are recommendations and that other factors may provide reasonable assurance that a person can competently perform a particular task. The set of recommendations has been reviewed by the NRC staff and found to be acceptable with one exception. In addition to the recommendations listed under Section 3.5 for Level I, II, and III personnel,

the candidate should be a high school graduate or have earned the General Education Development equivalent of a high school diploma. Since only one set of recommendations is provided for the education and experience personnel, a commitment to comply with the regulatory positions of this guide in lieu of providing an alternative to the recommendations of the standard means that the specified education and experience recommendations of the standard will be followed."

Alternative

Requirements of Section 3.5 will be followed as written, with the addition that where equivalencies to educational or experience attainments are used to establish qualification levels of individuals, the fact and the basis of this usage will be documented.

3. Documented Objective Evidence (Regulatory Position C.10).

Requirement

"10. Section 2.2, "Determination of Initial Capability", and Section 2.3, "Evaluation of Performance", of ANSI N45.2.6-1978 dealt with the use of evaluation of job performance and determination of initial capability to perform the job. Use of the measures outlined in these sections to establish that an individual has the required qualifications in lieu of required education and experience should result in documented objective evidence (i.e., procedures and record of written test) demonstrating that the individual indeed does have "comparable" or "equivalent" competence to that which would be gained from having the required education and experience."

Alternative

The documented evidence, which will be maintained, will include such categories as written examination and results; document training, either formal or on the job with other qualified individuals; a documented checklist of the individual's experience; or a documented record of demonstrated capability (i.e., work on a mockup unit).

c. Regulatory Guide 1.77, Rev. 2, 10/76, and ANSI N45.2.9-1974, "Requirements for Collection, Storage, and Maintenance of Quality Assurance Records for Nuclear Power Plants"

Provisions of this regulatory guide and standard are incorporated within the QA program, as applicable, with alternatives and clarifications as stated below. For

on-site application of the QA programs and associated activities, Wisconsin Electric's approved and licensed QA requirements will take precedence should they conflict.

1. Applicability of Standard (Section 1.2, Paragraph 1).

Requirement

"The extent to which the individual or total requirements of this standard apply will depend upon the nature and scope of the work to be performed and the importance of the item or service involved, and shall be specified in procurement document."

Alternative

The extent to which this standard applies is defined in procurement documents by identifying or referencing quality assurance system requirements. These documents include applicable requirements for the preparation, completion, content, collection, storage, and maintenance of quality assurance records.

2. Definition of a Quality Assurance Record (Section 1.4).

Requirement

"Quality Assurance Records - Those records which furnish documentary evidence of the quality of items and of activities affecting quality. For the purposes of this standard a document is considered a quality assurance record when the document has been completed."

Alternative

During the period from receipt or generation of the record until it is incorporated in the long-term protective system, these documents are afforded protection by normal office procedures including duplication of copies of completed records (signed and issued for use). When records describing products or services are provided formally to Wisconsin Electric, this action fulfills the requirement for long-term storage.

3. Completion of Quality Assurance Records (Section 3.2.1).

Requirement

"All such quality records shall be legible, completely filled out, and adequately identified to the item involved."

Alternative

Procedures identify requirements and provide guidance for completing quality assurance records. These procedures require that applicable portions of these records be completed. It should be recognized that in all cases it is not appropriate to "completely fill out" all records, particularly for those records completed on pre-printed forms.

4. Indexing of Quality Assurance Records (Section 3.2.2).

Requirement

"The quality assurance records shall be listed in an index."

Alternative

More than one index for quality assurance records is maintained to provide necessary access and retrievability. This practice is utilized as an alternative to a single index for all quality assurance records.

5. Receipt Control (Section 4.3).

Requirement

"As a minimum a receipt control system shall include:

2. A record of quality assurance records received."

Alternative

A receipt control system is maintained to fit service needs and requirements. The system is defined in procedures and identifies the types of records to be processed. Files are established in accordance with these procedures establishing a separate file location for each category of record. When a record is received, it is then filed in its preassigned location. The large volume of records and the diverse nature of the activities being performed practically preclude keeping a running inventory of each record received into in-process/working files. The presence of the document itself serves as the record of what has been received. When action is completed for a particular activity or component, the in-process information is checked to assure that all appropriate records are available.

6. Permanent Storage Facility (Section 5.6).

Requirement

"Where a single records storage facility is maintained, at least the following features should be contained in its construction:"

Alternative

The Westinghouse Records Center in Boyers, Pennsylvania, is utilized as a permanent records storage facility for inactive records which are stored in duplicate and/or single records. (Reference 3/8/79 U. S. Nuclear Regulatory Commission letter from Mr. W. P. Haase.) This facility is located in an underground limestone mine that is no longer being worked and is approximately 200 feet beneath the surface. Entry is made down a gradual graded hard surface roadway to a 24-hour guarded steel gate. This records storage facility provides an alternate to the construction criteria for a permanent records storage facility (as described below) which adequately protects records from possible destruction.

Requirement

"1. Reinforced concrete, concrete block masonry, or equal construction."

Clarification

The walls which constitute the perimeter of this storage facility are limestone ribs, 15-20 feet thick with eight-inch heavy duty concrete blocks constructed between the ribs from floor to ceiling. There are no doors or other openings in this perimeter to permit access to non-Westinghouse sections of this storage facility.

Requirement

"2. Concrete floor and roof with sufficient slope for drainage; if a floor drain is provided, a check valve (or equal) shall be provided."

Alternative

The limestone mine, approximately 200 feet below ground level, is impervious to water and is 36 feet above the water table. Additionally, the entrance to the Records Center is located approximately five miles away and 100 feet above the nearest stream. Floor and roof drains are not necessary.

Requirement

"3. Structures, doors, frames, and hardware should be Class A fire-rated with a recommended four-hour minimum rating."

Clarification

All doors, frames, and hardware are constructed of non-flammable materials such as steel or brass.

Requirement

"4. Sealant applied over walls as a moisture or condensation barrier."

Clarification

Aluminum enamel paint is applied to the walls and ceiling as a sealant.

Requirement

"5. Surface sealant on floor providing a hard-wear surface to minimize concrete dusting."

Clarification

Floors in the storage area are constructed of either asphalt or concrete over four feet of limestone. The asphalt floors are coated with a sealant. Concrete floors are coated with a hard wearing deck enamel.

Requirement

"6. Foundation sealant and provisions for drainage."

Clarification

The foundation consists of four foot thick limestone base covered with concrete or asphalt acting as the foundation sealant. Because of the underground location and the fact that limestone is impervious to water, no foundation draining is necessary.

Requirement

"7. Forced-air circulation with filter system."

Clarification

A natural draft of air flows through the mine and passes through forced-air circulation fans when entering and

exiting storage areas. This air is also filtered as it enters the storage facility. This system assures adequate air circulation through the storage areas.

Requirement

"8. Adequate fire protection system."

Clarification

A series of smoke detectors are located at strategic locations throughout the storage facility which would alert the fire crew at the first sign of a fire. A volunteer fire crew with equipment is located at the storage facility. Additionally, fire extinguishers are located throughout the storage areas. A guard makes a tour inside the area every four hours during non-working hours. A volunteer fire department, in a neighboring town, is located with 1-1/2 miles of the mine entrance.

Requirement

"9. No pipe other than those providing fire protection to the storage facility are to be located within the facility."

Alternative

A single water line is located within the storage facility to provide service water for sanitation and kitchen facilities. This line is equipped with shut-off valves both inside and outside the storage area. A drainage line is also located in the storage area to remove the discharge.

- d) Regulatory Guide 1.94, Rev. 1, 4/76, and ANSI N45.2.5-1974, "Supplementary Quality Assurance Requirements for Installation, Inspection, and Testing of Structural Concrete and Structural Steel During the Construction Phase of Nuclear Power Plants"

Westinghouse NSID will comply with these requirements. For on-site application of the QA programs and associated activities, Wisconsin Electric's approved and licensed QA requirements will take precedence should they conflict.

- e) Regulatory Guide 1.144, Rev. 1, 9/80, and ANSI N45.2.12-1977, "Requirements for Auditing of Quality Assurance Programs for Nuclear Power Plants"

Provisions of this regulatory guide and standard are incorporated within the QA program, as applicable, with the following alternatives and clarifications. For on-site

application of the QA program and associated activities, Wisconsin Electric's approved and licensed QA requirements will take precedence should they conflict.

1. Applicability of Standard (Section 1.2).

Requirement

"The requirements of this standard apply to both internal and external audits performed by or for the plant owner, contractors, and other organizations participating in activities affecting the quality of the structures, systems, and components of nuclear power plants which are subject to audit in accordance with the requirements of ANSI N45.2."

Clarification

The extent to which this standard applies is defined in procurement documents where applicable by identifying or referencing quality assurance system requirements for auditing. These documents contain requirements for a documented audit system, performance of audits in accordance with procedures or checklists, qualification of auditors, documentation of audit results, and verification of corrective action.

2. Annual Audits (Regulatory Position C.3).

Requirement

"Audits shall be regularly scheduled on the basis of the status and importance of the activities to assure the adequacy of, and conformance with, the program."

Alternative

In lieu of conducting annual audits of suppliers, an alternative audit program is applied which assures that suppliers have established and are maintaining an acceptable quality assurance program. Suppliers are audited initially to determine the acceptability of their quality assurance program. If acceptable, the supplier is placed on the approved supplier list. In lieu of routinely conducting an annual reaudit, a formal evaluation of the supplier is performed each year to determine if a reaudit is required during the upcoming year. This evaluation includes a review of some or all of the following: prior quality program audits, supplier surveillance activities, nature and frequency of hardware discrepancies, results of audits from other sources (customers, ASME, or NRC audits, etc.) when available, significant changes in the supplier's QA program, and the supplier's responsiveness and cooperation in resolving quality questions or problems. As a result of this evaluation, suppliers requiring a complete quality program reaudit are identified. The results of this

evaluation are documented and approved by responsible management.

Clarification

Some applicable elements of the quality assurance program occur at multiple locations and the audit schedule will encompass a representative sample of such locations within the annual period.

- f) Regulatory Guide 1.146, 8/80, and ANSI N45.2.23, "Qualification of Quality Assurance Program Audit Personnel for Nuclear Power Plants"

Provisions of this regulatory guide and standard are incorporated within the QA program, as applicable. For on-site application of the QA program and associated activities, Wisconsin Electric's approved and licensed QA requirements will take precedence should they conflict.



From NSD Engineering Quality Assurance
WIN 236-3626
Date June 2, 1982
Subject W NSD QAPP Manual Revision

To All QAPP Manual Holders

Attached for inclusion in your QAPP Manual is an approved copy of Quality Assurance Program Plan, Revision 6. Please enter this in your QAPP Manual deleting the obsolete revision. In addition, it is requested that you return the Return Receipt Sheet.

This transmittal should be routed by the addresses to their personnel in order to inform them of the new Quality Assurance Program Plan being issued.

If a problem exists with your procedure package, please contact D. E. Ulyas, (412) 256-3626.

D. E. Ulyas, Engineer
Engineering Quality Assurance
Nuclear Service Division

Attachment

RETURN RECEIPT SHEET

Please return to Mark C. Graney at the following address:

Internal Westinghouse mail to:

R&D 701 Building Bay 106

External Westinghouse mail to:

Westinghouse Electric Corporation
Power Systems

P. O. Box 2728
Pittsburgh, PA 15230

ATTN: M. C. Graney

Please print or type:

Manual assigned to _____

Manual Control Number _____

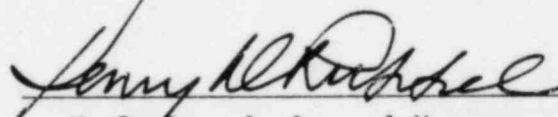
Address: _____

NUCLEAR SERVICE DIVISION
QUALITY ASSURANCE PROGRAM PLAN POLICY STATEMENT

Nuclear Service Division (NSD) has established a Quality Assurance Program Plan for the work performed in providing services for nuclear power plants. The Quality Assurance Program Plan is described herein. The Quality Assurance Program Plan presents NSD policy and supports the NSD objectives of providing prompt and dependable services to nuclear power plants in a cost effective manner and performing these services in compliance with applicable regulations, codes, and standards.

Each NSD department has the responsibility to apply the provisions of the Quality Assurance Program Plan in structuring and implementing their department procedures and practices. NSD personnel shall, therefore, be familiar with and comply with the requirements of the Quality Assurance Program Plan.

The NSD Product Assurance Manager has the overall responsibility for maintaining and directing the NSD Quality Assurance Program. He will assure compliance with the requirements and will provide the Quality Assurance interface with other Nuclear Energy Systems (NES) divisions involved in providing installation and operational plant services to utility customers. He will also provide the Quality Assurance interface concerning this scope of work with the NRC, suppliers, and with NSD customers. Deviations from the Quality Assurance Program Plan shall not be permitted except as specifically authorized by the Manager, Product Assurance, or the undersigned.



H. D. Ruppel, General Manager
Nuclear Service Division