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NRC-90- 130

10 CFR 50.55a

December 21, 1990

Document Control Desk
U. S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
INSERVICE TESTING PROGRAM FOR PUMP AND VALVES
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.55a(g), Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, submits herewith the "Pump and Valve Inservice Testing Program," Revision 0 dated December 18, 1990, for the third inspection interval for the Point Beach Nuclear Plant Units 1 and 2. This document outlines the inservice testing (IST) program based on the requirements of Section XI of the ASME Boiler and Pressure Vessel Code, 1986 Edition. Please note that this program was prepared assuming the same code edition is applied to both Units 1 and 2. Our second interval program which was submitted on February 10, 1981, and revised on January 16, 1984, included a relief request to apply the same code edition to both units. While that program was never formally approved by the NRC staff, we understand that there was no objection to this application. Since the determination of code applicability is proscribed by the provisions of 10 CFR 50.55a and not defined in the ASME Code, we believe a code relief request for this treatment is unnecessary. Accordingly we are assuming, unless we are informed otherwise, that the same code edition and addenda may be applied to both Point Beach Units for pump and valve testing.

The enclosed program satisfies the directions of Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs," Item 11, "IST Program Scope," except for those systems as identified in our letter dated October 29, 1990. In that letter we discussed the delay until April 30, 1991, in the implementation of testing procedures for these systems due to special testing and system modification requirements. It is also our understanding,

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based on the guidance in the GL 89-04, that any relief requests not previously approved may not be implemented until NRC approval has been granted.

Please contact us if you have any questions concerning the information provided in this letter or the enclosed program description.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Enclosure

Copy to: NRC Regional Administrator, Region III
NRC Resident Inspector

CWK/smp