

May 4, 1983

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
REQUEST FOR EXTENSION OF
ENVIRONMENTAL QUALIFICATION DEADLINE
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

The rule 10 CFR 50.49, "Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants", became effective on February 22, 1983 (Federal Register, Vol. 48, No. 15, p. 2729, dated January 21, 1983). Paragraph (g) of this rule requires that each holder of an operating license establish a goal of final environmental qualification of the electric equipment within the scope of the rule "by the end of the second refueling outage after March 31, 1982... The Director of the Office of Nuclear Reactor Regulatory [sic] may grant requests for extensions of this deadline to a date no later than November 30, 1985... "The second refueling outage after March 31, 1982 for Point Beach Nuclear Plant, Unit 2, is currently in progress and is scheduled to end on June 30, 1983. The second refueling outage after March 31, 1982 for Point Beach, Unit 1, is scheduled to begin on September 30, 1983 and end on March 30, 1984. The purpose of this letter is to request an extension of the deadline for environmental qualification of certain pieces of equipment at Point Beach, Units 1 and 2, for which the installation and/or environmental qualification documentation (including the appropriate modification of maintenance, spare parts, and quality assurance programs) cannot be completed by the 10 CFR 50.49(g) deadline.

It is our intent to complete the physical installation by June 30, 1983 of all the equipment items for Point Beach, Unit 2, which we committed to replace in our October 8, 1981 letter to you regarding "Supplemental Response to Safety Evaluation Report

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for Environmental Qualification of Safety-Related Equipment". These equipment items were identified as NRC Category I.B, "Equipment Qualification Pending Modification", in the Point Beach, Unit 2, Technical Evaluation Report attached to the "Safety Evaluation Report for Environmental Qualification of Safety-Related Equipment" for Point Beach, Units 1 and 2, dated December 22, 1982. The environmental qualification documentation of some of these equipment items, however, cannot be completed by June 30, 1983 due to delays in receiving the environmental qualification test reports and other required documentation and due to the concentration of our manpower on the design, procurement, qualification testing, and installation of the replacement equipment. Therefore, an extension of the environmental qualification deadline until March 30, 1984 is requested for Point Beach, Unit 2 only, to complete the environmental qualification documentation of the pieces of equipment listed in the enclosure to this letter.

In addition, paragraph (b)(3) of the rule expands the scope of equipment to be qualified by the end of the second refueling outage after March 31, 1982 to include "certain postaccident monitoring equipment". Wisconsin Electric performed a detailed evaluation of Regulatory Guide 1.97 in early 1981 and integrated the resulting instrumentation modifications into our overall TMI Action Plan backfit program. In addition, in our September 30, 1982 letter to you regarding NUREG-0737, Item II.B.3, "Post-Accident Sampling System", we committed to environmentally qualify some additional air-operated valves by June 1, 1984 to enhance our post-accident sampling capability. The schedule for completion of the above installations and modifications did not anticipate the requirement for completion of all Point Beach environmental qualification by June 30, 1983 for Unit 2 and by March 30, 1984 for Unit 1 (i.e., second refueling outages after March 31, 1982). These equipment upgrades and the environmental qualification documentation are expected to be completed by fall 1984 for both Point Beach units. Therefore, an extension of the environmental qualification deadline is requested for all 10 CFR 50.49(b)(3) equipment items for Point Beach, Units 1 and 2, until November 1, 1984 (i.e., the end of the next scheduled refueling outage for Point Beach, Unit 2). A list of these equipment items will be included in our May 20, 1983 response to 10 CFR 50.49(g).

We would be pleased to answer any questions you may have regarding these two requests for extension of the environmental qualification deadline imposed by 10 CFR 50.49. Your response is requested no later than May 30, 1983.

Very truly yours,

Executive Vice President

Sol Burstein

Enclosure

Copy to NRC Resident Inspector

## Enclosure

## ELECTRIC EQUIPMENT REQUIRING A DEADLINE EXTENSION FOR ENVIRONMENTAL QUALIFICATION POINT BEACH NUCLEAR PLANT, UNIT 2

TER Equipment Item Nos.	Equipment Description	Comments
1, 2, 3, 4, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17	Foxboro N-El0 Series Electronic Pressure Transmitters and New Associated Cables and Splices, where applicable	Replacement transmitters are scheduled to be installed and operational by June 30, 1983.(1) Qualification testing was completed satisfactorily based on review of preliminary information. Final qualification test reports have not yet been received.
5, 39	DeLaval Gems Water Level Transmitters and Associated Cable, Splices, Seal Assemblies, and Penetra- tions	New transmitters are physically installed and scheduled to be operational (2) by June 30, 1983(1). Qualification testing was completed satisfactorily based on partial information. Complete copies of the qualification test reports have not yet been received.
30, 32, 69	Conax Resistance Temper- ature Detectors (RTD's)	New RTD's are scheduled to be physically installed and operational (2) by June 30, 1983. (1) Qualification can be documented for our applications based on a preliminary review of the qualification test reports and analysis just recently received. Final reviews and documentation cannot reasonably be completed by June 30, 1983 due to other manpower commitments and priorities for environmental qualification work.

<sup>(1)</sup> The scheduled end of the second Point Beach Unit 2 refueling outage after March 31, 1982 (i.e., 10 CFR 50.49(g) deadline for environmental qualification).

<sup>(2)</sup> The final configuration for power supply and indication cannot be completed until the instrument bus upgrades and new Auxiliary Safety Instrumentation Panel installations in the control room are completed (see our March 21, 1983 letter regarding "Reply to Generic Letter No. 82-28..." for schedule).