Wisconsin Electric POWER COMPANY
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January 16, 1984

EXPRESS MAIL

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

Attention: Mr. J. R. Miller, Chief
Operating Reactors, Branch 3

Gentlemen:

DOCKETS 50-266 AND 50-301
INSERVICE TESTING PROGRAMS FOR PUMPS AND VALVES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In your letter dated August 24, 1983 you identified various areas in which additional information was required to support your review of the proposed Point Beach Nuclear Plant, Units 1 and 2, Inservice Test Programs, as submitted by our letter dated February 10, 1981. On November 1 and 2, 1983 a meeting was held at the Point Beach Nuclear Plant to discuss the items identified in your August 24 letter. The following individuals participated in this meeting: T. Colburn and J. Page, NRC; T. Cook and W. Hubble, EG&G; and T. Koehler, G. Maxfield, R. Link, J. Schweitzer, T. Staskal, and B. Fromm, Wisconsin Electric.

Many of the concerns identified in your August 24 letter were cleared up during the meeting, requiring only a clarification regarding operating philosophy or system/component function. However, other items required further evaluation and/or program changes. To maintain your timely review schedule, we agreed to complete our evaluations, revise the pump and valve inservice test programs, and resubmit the revisions by January 15, 1984. Pursuant to our agreement, attached are the revised inservice testing programs for Point Beach Nuclear Plant, Units 1 and 2. The majority of the changes in these revisions to the subject programs were accomplished to address the concerns identified in your August 24 letter in accordance with agreements reached in the November meeting. These changes include the following:

1. A general updating of the programs to reflect recent changes in plant design and operating philosophy.

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2. The identification of all primary system pressure isolation valves that meet the Event V criteria, as Category A/C.

3. The programs were reviewed and updated to assure that all containment isolation valves, that require Appendix J type "C" leakage testing, were included and categorized A or A/C, as applicable.

4. Specific notes providing cold shutdown testing justifications were added for the valves that require testing but cannot be tested during power operation.

5. The maximum stroke time for each power operated valve that required stroke testing was noted.

6. The emergency diesel generator air starting system has been included in the program.

7. Many of the pump and valve relief requests have been expanded to clarify the bases and alternate testing sections. Additional relief requests have been included for other areas in which code conformance is impractical.

The attached inservice testing programs for Point Beach, Units 1 and 2, were developed in compliance with the rules and regulations of 10 CFR 50.55a and Section XI of the ASME Boiler and Pressure Vessel Code, 1977 Edition through Summer 1979 Addenda. These programs are for the 120-month interval as stipulated in 10 CFR 50.55a(g)(4)(ii). These programs are to replace in their entirety the previous submittals for pump and valve testing for both units. These new programs are submitted for your review. The requested reliefs are submitted for your review and approval. The reliefs requested and the bases for the reliefs are presented in Appendices A and B for the pump and valve testing programs, respectively. As discussed in the bases for each relief requested, we believe that conformance with the specific code requirement is impractical for the Point Beach facility and that pursuant to 10 CFR 50.55a(g)(6), the Commission is authorized to grant such relief.

On February 12, 1979 the Commission published in The Federal Register a notice concerning a revision to 10 CFR 50.55a which changed the basis for inservice inspection and testing requirements for safety class components of nuclear power plants. The revised regulation requires that all nuclear power facilities meet, to the extent practical, the inservice inspection and testing requirements of Section XI of the ASME Boiler and Pressure Vessel

Code, as specified in 10 CFR 50.55a(b). Licensees were required at that time to update their inservice testing programs every 20 months.

Wisconsin Electric filed license amendment request Nos. 42 and 58 on February 17, 1977 and November 27, 1978 for Point Beach, Units 1 and 2, respectively, for Technical Specification changes necessitated by the revised inservice testing requirements as required by the Code of Federal Regulations. To date, only certain portions of the requested license amendments have been reviewed and approved by the NRC.

The Technical Specification changes previously referenced stand in agreement with these revised programs and should be expedited. It is our position that approval of these outstanding Technical Specification change requests need to be completed prior to implementation of these new inservice testing programs. Accordingly, we do not plan to implement the enclosed Point Beach inservice testing programs until 90 days after receipt of the NRC's approval of both the relief requests and Technical Specification changes.

At this time, I would like to emphasize that these programs are being provided for your information only. Only the relief requests are being submitted for your review and approval as required by 10 CFR 50.55a(g)(5). It should also be noted that future changes to the programs will inevitably occur. It is not our intention to submit future program changes to the NRC as long as the changes are within the testing requirements of the applicable code.

Should you have any questions regarding the attached programs or require additional clarification or details, please contact us.

Very truly yours,

C. W. Fay

Vice President-Nuclear Power

C. W. Fay

Attachments

Copy to NRC Resident Inspector