

Mr. C. W. Fay

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This request for additional information contained in this letter affects fewer than ten respondents; therefore, OMB clearance is not required under P.L. 96-511.

Sincerely,

Original signed by

James R. Miller, Chief
Operating Reactors Branch #3
Division of Licensing

Enclosure: Request for
Additional Information

cc: See next page

OFFICE	ORB#3:DL	ORB#3:DL <i>Pa</i>	ORB#3:DL				
SURNAME	PMKreutzer	IColburn/pn	JRMiller				
DATE	8/33/83	8/24/83	8/1/83				

Wisconsin Electric Power Company

cc:

Mr. Bruce Churchill, Esquire
Shaw, Pittman, Potts and Trowbridge
1800 M Street, N. W.
Washington, D. C. 20036

USNRC Resident Inspectors Office
6612 Nuclear Road
Two Rivers, Wisconsin 54241

Mr. James J. Zach, Manager
Nuclear Operations
Wisconsin Electric Power Company
Point Beach Nuclear Plant
6610 Nuclear Road
Two Rivers, Wisconsin 54241

Mr. Gordon Blaha
Town Chairman
Town of Two Creeks
Route 3
Two Rivers, Wisconsin 54241

Ms. Kathleen M. Falk
General Counsel
Wisconsin's Environmental Decade
114 N. Carroll Street
Madison, Wisconsin 53703

U. S. Environmental Protection Agency
Federal Activities Branch
Region V Office
ATTN: Regional Radiation
Representative
230 S. Dearborn Street
Chicago, Illinois 60604

Chairman
Public Service Commission of Wisconsin
Hills Farms State Office Building
Madison, Wisconsin 53702

Regional Administrator
Nuclear Regulatory Commission, Region III
Office of Executive Director for Operations
799 Roosevelt Road
Glen Ellyn, Illinois 60137

REQUEST FOR ADDITIONAL INFORMATION

POINT BEACH UNITS 1 AND 2 INSERVICE INSPECTION VALVE PROGRAM

A. General Questions and Comments

1. For testing of valves during cold shutdowns, it is the NRC position that the licensee is to commence testing as soon as the cold shutdown condition is achieved but not later than 48 hours after shutdown, and continue until complete or the plant is ready to return to power. For planned cold shutdowns, where ample time is available for testing all the valves identified for the cold shutdown frequency in the IST program, exceptions to the 48 hours may be taken. (Refer to item 2.2.K)
2. Valves that cannot be exercised during cold shutdowns, due to plant operating conditions, must have individual specific justifications provided. (Refer to item 2.2.K)
3. Provide the limiting value of full stroke time for each Category A and B power-operated valve in the IST program.
4. Are all valves that receive a Type C leak-rate test in accordance with the requirements of 10 CFR 50, Appendix J, included in the IST program and categorized A or A/C as applicable?
5. Do any Point Beach component cooling water pumps or valves perform a function that is important to safety (excluding the containment isolation function of the listed valves in the IST program)?

6. Do the Point Beach, Units 1 and 2, charging pumps perform a function that is important to safety? What flow paths are required to be available for emergency boration?
7. Do any Point Beach, Units 1 and 2, Post Accident Containment Isolation system valves perform a function that is important to safety?
8. Does Point Beach, Units 1 and 2, utilize a chill water system for supplying air conditioning or ventilating equipment in the Control Room?
9. The NRC has determined that the diesel generator fuel oil transfer system and air start system (from the air receivers to the diesel) perform a function that is important to safety, therefore, the applicable pumps and valves are required to be addressed in the IST program.
10. Have valves that perform a primary pressure boundary isolation function been addressed in the Point Beach, Units 1 and 2, technical specifications?

B. Safety Injection System

1. Provide the specific technical justification for not full- or partial-stroke exercising valves 842A and B during cold shutdowns. What alternate test methods have been considered for full-stroke exercising these valves?
2. Provide the specific technical justification for not full-stroke exercising valves 845A, B, C, D, E, and F during refueling outages. Do valves 845E and F perform a pressure boundary isolation function?
3. Provide the specific technical justification for not full-stroke exercising valves 852A and B during power operation.

4. Provide the specific technical justification for not full-stroke exercising valves 853A, B, C, and D during cold shutdowns.
5. Are valves 866A, 866B, 878B, and 878D required to change position at any time to perform a safety function?
6. Provide the specific technical justification for not partial-stroke exercising valve 867B during cold shutdown. What alternate test methods have been considered for full-stroke exercising valves 867A and B?
7. Provide the specific technical justification for not full-stroke exercising valves 878A and C during power operation.
8. Provide the specific technical justification for not full-stroke exercising valves 826B and C during power operation.
9. Provide a more detailed technical justification for not full- or partial-stroke exercising valves 854A and B during cold shutdowns.
10. Are valves 856A and B required to change position at any time to perform a safety function?
11. Provide the specific technical justification for not full-stroke exercising valves 857A and B during power operation.
12. How are valves 889A and B partial-stroke exercised during power operation?
13. The NRC position for vacuum breakers is that they should be in the IST program and be exercised in accordance with IWV-3522. Provide the specific technical justification for not exercising valves 840A and B during power operation.

14. Provide the specific technical justification for not full-stroke exercising valves 847A and B during power operation.
15. What alternate test methods have been considered for full-stroke exercising valves 858A and B? Are these valves full-stroke exercised during refueling outages, as indicated in the IST program valve listing, or partial-stroke exercised during refueling outages, as indicated in the relief request?
16. How are valves 862A and B full-stroke exercised during refueling outages?
17. Provide the specific technical justification for not full-stroke exercising valves 871A and B during power operation.
18. Provide the specific technical justification for not full-stroke exercising valves HCV-836A and B during power operation.

C. Auxiliary Coolant System

1. Provide the specific technical justification for not full-stroke exercising valves 750 and 751 during power operation.
2. Provide the specific technical justification for not full-stroke exercising valves 710A and B during power operation. Why was Note 5 referenced in the remarks section for these valves?
3. Provide the specific technical justification for not full-stroke exercising valves 718A and B during power operation.
4. Provide the specific technical justification for not full-stroke exercising valve 720 during power operation.
5. Are valves 822A and B required to change position at any time to perform a safety function?

6. Provide the specific technical justification for not full-stroke exercising valves 754A, 754B, 759A, and 759B during power operation.
7. How is valve 767 verified shut (its safety position) during cold shutdowns?
8. Is valve 769 closed at all times during power operation?

D. Reactor Coolant System

1. Review the safety function of valve 529 to determine if it should be included in the IST program and categorized A/C.
2. Provide the specific technical justification for not full-stroke exercising valve LCV-427 during power operation.
3. It is the current NRC position that the pressurizer power operated relief valves (PORVs) should be included in the IST program as Category "B-active" valves and be exercised at each cold shutdown and the PORV block valves should be included in the IST program as Category "B-active" valves and be exercised quarterly.

E. Sampling System

1. Review the safety function of valves 951 (location G-12), 953 (location F-12), and 955 (location E-12) to determine if they should be included in the IST program and categorized A.

F. Chemical and Volume Control System

1. Provide the specific technical justification for not full-stroke exercising valve 313 during power operation.

2. Provide the specific technical justification for not full-stroke exercising valve 371 during power operation.
3. Is valve LCV-112B required to change position at any time to perform a safety function?

G. Main and Reheat Steam

1. Do valves CV-2015 and -2016 perform any safety function in the open position?
2. Provide the specific technical justification for not full-stroke exercising valves CV-2017 and -2018 during power operation.
3. Provide the specific technical justification for not full-stroke exercising valves MS-2017A and -2018A during power operation. How are these valves verified closed, their safety position, during cold shutdowns?

H. Service Water System

1. Is valve 278 required to change position at any time to perform a safety function?
2. Provide the specific technical justification for not full-stroke exercising valve MOV-2880 during power operation.
3. Are valves MOV-2907 and -2908 required to change position at any time to perform a safety function?
4. Provide the P&ID that shows valves MOV-2930A and B for our review at the working meeting.

I. Instrument Air

1. Provide P&ID M-209 SH-5 for our review at the working meeting.

J. Heating and Ventilation

1. Provide the P&ID which shows valves 3200A CHK, CV-3200A, CV-3200B and CV-3200C for our review at the working meeting.
2. Provide the specific technical justification for not full-stroke exercising valve 3200A CHK during power operation.

K. Auxiliary Feedwater System

1. Provide the specific technical justification for not full- or partial-stroke exercising the following check valves during power operation.

100	106
101	107
102	108
103	109
104	110
105	

2. What is the safety function of check valves 111, 112, and 113?
3. Provide the specific technical justification for not verifying closure of check valves 466A, 466B, 476A, and 476B during power operation.
4. Are valves CV-4002, CV-4007, and CV-4014 required to open for pump protection?
5. Review the safety function of check valves 114, 115, 116, and 117 to determine if they should be included in the IST program and categorized C.

PUMP PROGRAM

1. The 1977 Edition through the summer of 1978 Addenda of the ASME Code requires both differential pressure and flow rate to be measured for all pumps being tested in accordance with Section XI requirements.
2. Provide an explanation of Note 6 for the Service Water Pumps during the working meeting.
3. Provide a more detailed technical justification for not testing all pumps in the IST program at the Code specified frequency of monthly.
4. Is proper lubricant level or pressure for all applicable pumps in the IST program being observed in accordance with the requirements of Section XI?
5. Provide technical justifications for not including the following pumps in the IST program:
 - A. Boric Acid Transfer
 - B. Boron Injection and Recirculation
 - C. Control Area Chilled Water
 - D. Charging
 - E. Component Cooling
 - F. Spent Fuel Pool Cooling
 - G. Diesel Generator Fuel Oil Transfer
 - H. Diesel Generator Jacket Water Cooling