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December 3, 1991

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PRIORITY ROUTE
FILES

Mr. A. Bert Davis, Regional Administrator
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Gentlemen:

DOCKETS 50-266 AND 50-301
MAIN STEAM ISOLATION VALVE
OPERABILITY CONSIDERATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

The purpose of this letter is to provide our follow-up to the Wisconsin Electric/NRC Enforcement Conference held at the NRC Region III offices in Glen Ellyn, Illinois, on November 22, 1991, regarding the failures of the Main Steam Isolation Valves (MSIVs) at Point Beach Nuclear Plant, Unit 2. At the Enforcement Conference, we concurred that certain mistakes and errors in judgment may have occurred in the maintenance, testing, corrective action, documentation, and reporting of MSIV problems and failures. We believe that the root cause of these occurrences was a mind-set specific to the operability of the MSIVs.

In the early 1970's, we experienced several incidents of sudden MSIV closure as we approached 100% power. We determined at that time that the valve discs were susceptible to "wiping-in" due to high steam flow, and the 2MS-2017 MSIV was modified to include a larger air operator to hold the valve open against the steam flow. We also performed other modifications to the valves to minimize the probability of inadvertent closure. Given these problems and the nature of the valve design, a belief persisted that, even if the valves failed to fully shut at no or low flow, the valves would shut with any significant steam flow.

Although we believe this mind-set was unique to the MSIVs, we recognize a potential need to improve the scope and implementation of several existing programs as they apply to all of our safety-related systems and equipment. Many of these

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management processes were initiated in the last year or so and are becoming more effective as they mature. These existing programs include the Condition Reporting System with its associated operability and reportability determinations; corrective maintenance reporting and documentation; preventive maintenance programs; root cause analyses and correction of significant or repetitive equipment problems; operating experience review; and surveillance testing. We intend to increase management attention to these programs by evaluating them for adequacy, making changes as necessary; and by enhancing the training of our personnel on their implementation, emphasizing the vital importance of communicating equipment problems to management.

Specific actions that we will take to improve the above existing programs are listed below. We expect to complete Items 1, 2, 4, 5, and 7 by February 1992 and Items 3 and 6 approximately one year later. We will provide an updated schedule and discuss our methodology and preliminary findings during the February 1992 meeting proposed in our November 4, 1991, letter.

1. We will request a Technical Specification change to add the MSIVs and Non-Return Stop Valves (NRSVs) to Section 15.3, "Limiting Conditions for Operation," and to clarify Section 15.4.7 regarding surveillance testing of the MSIVs.
2. To help determine whether we have any chronic or repetitive problems with any other safety-related equipment, a written Operator and Maintenance Worker Survey will be conducted seeking this information from an operational or maintenance perspective. Follow-up interviews and/or focus group discussions will be conducted as necessary.
3. We will initiate a systematic review of operating and machinery history of safety-related equipment; the review will cover the last five years. This will include records such as Licensee Event Reports, Significant Operating Event Reports, Non-Conformance Reports, Maintenance Work Requests, and Nuclear Plant Reliability Data System Reports. We will use the results of Item 2 to focus this review.
4. An INPO Operating Experience Assist Visit requested earlier this year has been scheduled for December 1991. We intend to seek the INPO staff's advice on identification of root cause techniques to incorporate into both our corrective maintenance and operating experience review programs.

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5. We will conduct a review of the assumptions in our FSAR accident analyses against the Limiting Conditions for Operation (LCO) Section and the Surveillance Section of the Point Beach Technical Specifications to determine if additional equipment LCOs or surveillances should be added. We will submit Technical Specification Change Requests to make the appropriate revisions resulting from this review. Mr. R. K. Hanneman will be our liaison person in regard to Technical Specification matters. If you wish to designate a particular individual with whom he should discuss these matters, please let us know.
6. The equipment required in the assumptions of our FSAR accident analyses will be compared to the maintenance call-up system to ensure that our preventive maintenance program covers this equipment.
7. To help ensure that equipment problems are promptly evaluated for reportability and operability, we will revise the Maintenance Work Request defect tag to initiate concurrent reportability and operability determinations. In the interim, we will issue an Operations Night Order to alert the operating crews to this issue.

There are three additional items that we would like to clarify and commit to:

1. We now understand that for any condition where a single MSIV would not have performed its safety function if called upon, a report will be made to the NRC in accordance with 10 CFR 50.72 and 10 CFR 50.73.
2. If a safety-related component or system does not meet its surveillance testing requirements or is not capable of performing its safety function as analyzed in the FSAR, whether identified in the performance of a specific surveillance test or otherwise, that component will be considered inoperable, unless it can be otherwise shown that the safety function can be satisfied.
3. Until the NRC Region III Regional Administrator and Wisconsin Electric agree otherwise, in cases where a safety-related component or system is inoperable and there is no governing LCO in the Technical Specifications, we will notify the Resident Inspector or the NRC Headquarters Duty Officer within four hours.

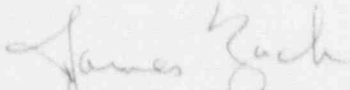
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As noted previously, we intend to schedule a meeting with you and your staff in February 1992. The purpose of the meeting will be to provide an update on our modification plans for the MSIVs and NRSVs and an update on the evaluations conducted and enhancements planned for the above administrative programs.

We want to emphasize that we intend to continue to take conservative actions in the operation of the Point Beach units to protect the public health and safety beyond minimal actions required by the Technical Specifications and to keep the NRC informed of these actions.

We believe the above commitments will ensure the continued safe operation of both units at Point Beach, while we continue to evaluate further long-term corrective actions and program enhancements.

Very truly yours,



James J. Zach
Vice President
Nuclear Power

Copies to NRC Document Control Desk
NRC Resident Inspector