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VPNPD-95-068

August 16, 1995

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U. S. NUCLEAR REGULATORY COMMISSION
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Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO GENERIC LETTER 92-01, REVISION 1, SUPPLEMENT 1
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Nuclear Regulatory Commission (NRC) Generic Letter (GL) 92-01, Revision 1, Supplement 1, "Reactor Vessel Structural Integrity," dated May 19, 1995, was issued to require addressees to identify, collect, and report any new data pertinent to analysis of structural integrity of their reactor pressure vessels (RPVs). It also requires an assessment of the impact of this new data on RPV integrity analyses relative to the requirements of Section 10 CFR 50.60, 10 CFR 50.61, Appendices G and H to 10 CFR 50, and any potential impact on low temperature overpressure (LTOP) limits or pressure-temperature (P-T) limits.

The Generic Letter supplement requires addressees to provide the following information within 90 days:

- (1) a description of those actions taken or planned to locate all data relevant to the determination of RPV integrity, or an explanation of why the existing data base is considered complete as previously submitted.

The supplement also requires the following information to be provided within six months:

- (2) an assessment of any change in best-estimate chemistry based on consideration of all relevant data;
- (3) a determination of the need for use of the ratio procedure in accordance with the established Position 2.1 of Regulatory Guide 1.99, Revision 2, for those licensees that use surveillance data to provide a basis for the RPV integrity evaluation; and

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- (4) a written report providing any newly acquired data as specified above and (1) the results of any necessary revisions to the evaluation of RPV integrity in accordance with the requirements of 10 CFR 50.60, 10 CFR 50.61, Appendices G and H to 10 CFR Part 50, and any potential impact on the LTOP or P-T limits in the technical specifications or (2) a certification that previously submitted evaluations remain valid. Revised evaluations and certifications should include consideration of Position 2.1 of Regulatory Guide 1.99, Revision 2, as applicable, and any new data.

This letter provides the Wisconsin Electric Power Company (WE) response to Requirement (1) for Point Beach Nuclear Plant Units 1 and 2. Responses to requirements (2), (3), and (4) will be provided by November 20, 1995.

Background

The Point Beach Nuclear Plant Unit 1 reactor vessel was manufactured by The Babcock & Wilcox Company (B&W) under contract to Westinghouse Electric Corporation (Westinghouse). Pertinent RPV data for Point Beach Unit 1 is therefore available from both B&W and Westinghouse.

Manufacture of the Point Beach Nuclear Plant Unit 2 reactor pressure vessel was begun by B&W under contract to Westinghouse. However, during fabrication a labor stoppage occurred at the B&W manufacturing facility. In order to expedite completion of the Point Beach Unit 2 reactor vessel, the partially completed RPV was shipped to a Combustion Engineering, Inc. (CE) facility, and fabrication was completed there by CE. Therefore, pertinent RPV information is available from B&W, CE, and Westinghouse for Point Beach Unit 2.

Wisconsin Electric Power Company has implemented a program to identify and locate all data relevant to the determination of reactor pressure vessel integrity for Point Beach Units 1 and 2. This program includes participation in several cooperative industry groups, as well as independent efforts to obtain all data. As a result, WE has access to the most complete and accurate data available regarding the Point Beach reactor pressure vessels. A discussion of WE's efforts to obtain all data relevant to RPV integrity is provided below.

B&W Owners Group's Reactor Vessel Working Group

Wisconsin Electric Power Company has been a member of the B&W Owners Group's Reactor Vessel Working Group (B&WOG RVWG) since its formation in 1988. The B&WOG RVWG, and its predecessor organization, the B&WOG's Materials Committee, has been acquiring and documenting data relevant to the integrity of all Linde 80 reactor vessel weldments and base metals contained within its member plant RPVs since 1977.

The B&WOG RVWG has determined that additional weld chemistry and initial toughness data from a few boiling water and foreign pressurized water RPVs fabricated by B&W may not have been previously considered by the RVWG. The B&WOG RVWG is making efforts to obtain additional data from these plants which could be relevant to the evaluation of reactor vessel integrity for some RVWG plants.

Nevertheless, the B&WOG RVWG believes that all currently available data have been appropriately considered in the determination of the integrity of Linde 80 welds. Sources of these data are listed in B&WOG Report No. BAW-2257, "Response to Part (1) of Generic Letter 92-01, Revision 1, Supplement 1," which was submitted to the NRC by the B&WOG in letter OG-95-1527, dated August 1, 1995. These data sources were considered in the development of previous WE responses to GL 92-01, Revision 1 and associated requests for additional information.

Westinghouse Owners Group

The Westinghouse Owners Group (WOG) Materials Subcommittee has compiled a database of all information relevant to reactor vessel integrity that is available from Westinghouse Electric Corporation. The information included in the database is from original fabrication records, reactor vessel surveillance program testing, and other supplemental testing performed by Westinghouse. Wisconsin Electric will review this database for additional data for Point Beach.

CE-Reactor Vessel Group/CEOG-Reactor Vessel Working Group

For Point Beach Unit 2, the circumferential weld joining the intermediate and upper shells was fabricated by Combustion Engineering (CE) and is identified as weld heat 21935. All other welds relevant to Point Beach Unit 2 RPV integrity were fabricated by B&W. To ensure that data relevant to this CE weld were obtained, WE was a participant in the CE-Reactor Vessel Group (CE-RVG) program. This program included a thorough review of the records for RPV pressure boundary plates, forgings, and welds for

all reactor vessels fabricated by CE. The CE-RVG program identified all relevant information within the CE records for Point Beach Unit 2 and other plants. Wisconsin Electric received weld chemistry data from participation in the CE-RVG program, including weld deposit chemistry data for weld heat 21935.

In addition to the CE-RVG program, WE has been a participant in the Combustion Engineering Owners Group Reactor Vessel Working Group (CEOG-RVWG) since its inception earlier this year. The CEOG-RVWG is undertaking a task to further research data files and log books compiled by CE to identify any additional data relevant to reactor vessel integrity. This task is focusing on data that may be available in locations other than the plant-specific fabrication records reviewed in the CE-RVG program. The CEOG-RVWG task will compile and evaluate all available data relevant to reactor vessel integrity to determine best-estimate weld chemistry values for each CE-fabricated weld heat.

Other Activities to Identify Relevant Data

Wisconsin Electric has obtained weld chemistry data from Baltimore Gas & Electric Company pertaining to the Point Beach Unit 2 CE-fabricated weld (heat 21935). This data will be considered in the determination of best-estimate weld chemistry for this weld heat.

Summary

Wisconsin Electric is undertaking several initiatives to ensure that all data relevant to the determination of reactor vessel integrity for Point Beach Units 1 and 2 is considered. The majority of this work will be completed by November 20, 1995 and the results will be reported at that time.

As discussed above, an effort to identify additional relevant data for weld heat 21935 is being conducted for Point Beach Unit 2 by the CEOG-RVWG. This data is expected to be available in early 1997. This data and an evaluation of its effect on reactor vessel integrity will be provided to the NRC at that time.

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If you have any questions or require additional information, please contact us.

Sincerely,

Bob Link
Vice President
Nuclear Power

JRP/cms

Subscribed and sworn to before me
this 16th day of August, 1995.

Jacqueline Gorski
Notary Public, State of Wisconsin

My Commission expires 10/27/96.

cc: NRC Regional Administrator, Region III
NRC Resident Inspector