



Wisconsin Electric POWER COMPANY
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June 29, 1984

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 Reactor Branch No. 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
IMPLEMENTATION OF POST-TMI RELATED ISSUES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated March 5, 1984, Wisconsin Electric submitted information regarding several equipment receipt and installation delays which impacted the scheduler commitments contained in the NRC's modified Confirmatory Order dated July 12, 1983. The delays discussed in that letter concerned installation of the auxiliary safety instrumentation panels (ASIPs) and the equipment for the instrumentation bus upgrade at our Point Beach Nuclear Plant. The completion dates for this equipment effects the completion dates for the accident monitors addressed by NUREG-0737 items II.F.1.3 through II.F.1.6 and the permanent power supplies for NUREG-0737 items II.F.1.1 and II.F.1.2. A number of circumstances which resulted in these schedule delays were presented in our March 5, 1984 letter.

Subsequently, in a telephone call on June 6, 1984, Mr. Colburn of your staff discussed with members of our staff the reasons for the schedule delays presented in the March 5, 1984 letter. At that time, Mr. Schellin of our staff mentioned several additional equipment problems, subsequent to the March 5 letter, which had delayed some of the interim milestones in the ASIP schedule and concerns regarding the air handling units for the ventilation and air conditioning (VAC) system for the new battery and electrical equipment rooms, a part of the instrumentation bus upgrade. We indicated that these additional delays should not affect the ASIP equipment startup and testing schedule presented in our March 5 letter or the commitment from our March 30, 1984 letter to have these new instruments integrated into plant procedures and operator training on the procedures completed by January 31, 1985. On June 26, 1984, we telecopied a letter to you which supported the information provided in the telephone call on June 6 and also mentioned our concerns with the expected operational date of the VAC system due to valve procurement requirements.

In a further telephone call on June 26, Mr. Colburn requested that we provide an additional letter discussing those measures we had implemented which minimized the schedule delays we had experienced and to further qualify a schedule delay for these NUREG-0737 items through the end of 1984. Among the steps we have or are taking are the following:

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1. Wisconsin Electric took over the design and seismic analysis of the floor penetration sleeves for the ASIP from the panel vendor and contracted with a separate architect-engineer to produce construction, fabrication and installation drawings.
2. We have provided for timely Quality Assurance (QA) inspections of panel welding and QA sub-vendor visits to ensure correct construction. We have provided engineering staff visits and reviews at the panels vendors site to review and adjust the design and to facilitate fabrication drawing completion. These reviews included on-the-spot design changes and approvals to ensure omissions and defects observed during fabrication were corrected and that resolution of panel access concerns was achieved expeditiously.
3. We have provided on-site QA and engineering inspections of the panels during final assembly and shop testing to identify and correct wiring errors utilizing corporate engineering support.
4. We have stepped in to purchase panel components for vendor installation, expedited delivery and receipt inspections, and ensured component supplier rework where necessary.
5. Within our available manpower resources, we have provided the panel vendor both structural and electrical engineering reviews and design changes. We have participated in engineering reviews with the seismic analyst to ensure current modeling and to resolve resonance of sub-panel section concerns.
6. We have waived the completion of environmental testing requirements until after fabrication and delivery of the panels and have provided component selection and testing procedure guidance based on our prior utility owner's group experience.
7. We have developed expedited schedules and procedures for pre-shipment and receipt inspections. To ensure earliest delivery and installation of completed components we have, at additional cost, split shipment of the panel and related components.
8. We are providing detailed pre-installation plans and site preparation procedures, including premapping of wall rebar to determine optimum location for anchor points, with critical path charting, staffing increases and on-site engineering attention to ensure expeditious installation and on-site testing of the panels at Point Beach.

We have also taken similar extraordinary measures with the vendors for the instrumentation bus equipment and VAC suppliers to minimize schedule delays. These measures include the following:

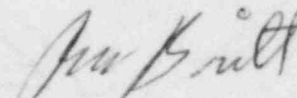
1. As discussed in the March 5 letter, the vendor for the air handling units experienced a change in management and corporate marketing intent which resulted in the manufacturer assigning a relatively low priority to the design and fabrication of these units. Our negotiating efforts to upgrade this priority were at the Vice-President level and resulted in getting the units shipped on June 1, 1984.

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2. The air handling unit vendor had a number of QA problems which were the subject of an NRC IE Information Notice. As a result, additional precautions were followed in an attempt to insure that similar problems were not encountered with the Point Beach units. This resulted in schedule delays.
3. Wisconsin Electric engineering provided extra attention to the air handling unit order from June 1983 to facilitate design alternative reviews and fabrication procedures. This included plant visits in 1984 and bi-weekly plant trips beginning in March until the units were shipped.
4. Since the vendor contracted to provide cooling water to the air handling units has experienced delays in obtaining the necessary valves, Wisconsin Electric engineers have taken over the specification of the valves and may assume procurement of the equipment as well. We have contacted other utilities, vendors, and architect-engineer firms in attempts to locate suitable valves. At this time we have located suppliers for the relief valves and system dampers.

In light of the measures we have, and are, taking to facilitate the fabrication, installation and testing of the equipment, we believe we have demonstrated a best effort to comply with the NUREG-0737 TMI related backfit requirements and schedules. As summarized in our March 5, 1984, and June 16, 1983 letters we have also instituted interim measures to make the information to be provided by these accident monitoring instruments available to the plant operator at alternate locations. Accordingly, we urge you to act promptly on a modification to the July 12, 1983 Confirmatory Order to extend the completion date for installation of the equipment to not later than December 31, 1984.

Very truly yours,



President

R. W. Britt/cj

Copy to NRC Resident Inspector