



UNITED STATES
NUCLEAR REGULATORY COMMISSION
WASHINGTON, D.C. 20555

April 17, 1992

Docket Nos. 50-266
and 50-301

Mr. James J. Zach, Vice President
Nuclear Power Department
Wisconsin Electric Power Company
231 West Michigan Street, Room P379
Milwaukee, Wisconsin 53201

Dear Mr. Zach:

SUBJECT: INSERVICE TESTING, THIRD 10-YEAR PROGRAM, INCLUDING RELIEF
REQUESTS (TAC NOS. M79386 AND M79387)

By letters dated December 21, 1990 and June 10, 1991, Wisconsin Electric Power Company submitted the Point Beach Nuclear Plant, Units 1 and 2, Inservice Testing Program proposed for the third 10-year interval of operation. The proposed program incorporates the NRC guidance contained in Generic Letter (GL) 89-04, "Guidance on Developing Acceptable Inservice Testing Programs." The staff has reviewed and evaluated the proposed program, with particular attention given to the 52 relief requests contained in Revision 1. Our review also considered your separate responses to the generic letter.

Generic Letter 89-04 provided guidance on acceptable alternatives to Code requirements for certain aspects of inservice testing. Since a safety evaluation for the Point Beach Nuclear Plant Inservice Testing Program had not previously been issued, the generic letter requested you to review your program against the guidance provided and to make revisions as necessary to address the NRC positions in GL 89-04. On October 3, 1989, you provided the response to GL 89-04 for Point Beach Nuclear Plant with status updates provided in letters dated March 2, 1990, June 28, 1990, January 16, 1991, and April 22, 1991. A schedule for completing implementation of the guidance in GL 89-04 is included in the April 22, 1991, submittal. You should address the schedule for the Chemical and Volume Control (CVCS)-charging system which was listed but not discussed in the April 22, 1991, submittal, and should provide NRC with a completion schedule for any modifications identified as necessary to comply with GL 89-04 for all remaining open items.

The NRC staff, with technical assistance from Brookhaven National Laboratory, has reviewed and evaluated the revised IST program relief requests. The staff adopts the evaluations and conclusions contained in the Technical Evaluation Report prepared by Brookhaven and incorporates it into the Safety Evaluation by reference. The Safety Evaluation with the Technical Evaluation Report attached is enclosed.

A summary listing of the 52 relief requests is provided in Table 1 of the Safety Evaluation. The final column of this table states whether the request is denied, granted, or granted with provisions. No decision was reached on those items identified as open. We are granting relief from the testing requirements which we have determined would be impractical to

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Mr. James J. Zach

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compliance would result in a hardship without a compensating increase in safety, and where the proposed alternative testing provides an acceptable level of quality and safety.

An "Anomalies and Action Items" section in the TER identifies items which you should address in a submittal within 1 year of the date of this SE or by the schedule requested in the specific anomaly or action item. Actions to be taken on open items are also identified in this section. For relief requests that have been denied, testing should comply with the Code requirements or GL 89-04 guidelines within the first quarter after receiving this SE. VRR-4 should be addressed as discussed in SE Section 4.0 and TER Sections 3.14.3 and 5.34 prior to the next refueling outage for each unit.

You are required to comply with the IST Program defined in Revision 1 where relief has been granted by GL 89-04 and the enclosed SE. IST Program changes such as additional relief requests or changes to approved relief requests should be submitted for staff review, but should not be implemented prior to review and approval by the NRC. New or revised relief requests meeting the positions in GL 89-04 should be submitted to the NRC staff, but can be implemented provided the guidance in GL 89-04, Section D, is followed. IST Program changes that involve additions or deletions of components from the IST Program should be provided to the NRC. Implementation of the program, including the guidance in GL 89-04, is subject to inspection by NRC.

Our review did not include verification that all pumps and valves within the scope of 10 CFR 50.55a and Section XI are contained in the IST program. Additionally, for the components included in the IST program, no determination was made to ensure all applicable testing requirements were identified. Therefore, you are requested to provide the NRC with a description of the process used in developing the IST program. The submittal should include, as a minimum, details of the documents used, the method of determining if a component requires inservice testing, the basis for the testing required, the basis for categorizing valves, and the method or process used for maintaining the program current with design modifications or other activities performed under 10 CFR 50.59. If a description of this process is not already available from existing documentation, the NRC envisions that this request could be answered in two-to-four pages. It could be incorporated into the IST program in appropriate sections. The information should be included with your response to the TER anomalies and action items.

We would be pleased to discuss our evaluation with you.

Sincerely, *original signed by*

Robert B. Samworth, Sr. Project Manager
Project Directorate III-3
Division of Reactor Projects III/IV/V
Office of Nuclear Reactor Regulation

Enclosures: As stated / *See Previously Concurrence

cc: See next page

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Mr. James J. Zach
Wisconsin Electric Power Company

Point Beach Nuclear Plant
Unit Nos. 1 and 2

cc:

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