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September 10, 1984

Docket Nos. 50-266
and 50-301

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Mr. C. W. Fay, Vice President
Nuclear Power Department
Wisconsin Electric Power Company
231 West Michigan Street Room 308
Milwaukee, Wisconsin 53201

Dear Mr. Fay:

We have received your July 6, 1984 request for relief from the requirements of ASME Code Section XI 2nd ten year interval Inservice Inspection Requirements for Point Beach Units 1 and 2. These requests are under review.

Your July 6 letter also mentioned several areas associated with previously granted relief for Point Beach Units 1 and 2 for which you requested clarification or correction.

The first item of your concern covers our March 29, 1984 relief from the ASME Code requirement to perform surface examinations on three piping-to-penetration cap welds in the auxiliary coolant and safety injection systems. Relief was granted provided that the first weld in the process pipe outside containment be subject to the required ASME Code examination. You have subsequently determined that the buried welds inside the penetration are shop welds and that only some of the first welds outside containment were shop weld while others were field welds. You have stated that the shop welds outside containment will more closely match the buried welds in terms of welding process and manufacturing conditions than would field welds; therefore, you feel that inspection of the first shop weld outside containment is more appropriate than inspection of the first weld (since some first welds would be field welds) and intend to meet the conditions of the granted relief by inspecting the first shop weld outside containment.

The NRC staff's purpose in conditioning the granted relief was to provide assurance that the integrity of the inaccessible welds would be maintained to the extent practicable. The staff feels that inspection of the first weld outside containment provides this assurance. The staff is more concerned with the location of the weld than its type. Therefore, the staff disagrees with your position to inspect the first shop weld outside containment to meet the conditions of this granted relief.

Secondly, with regard to your January 13, 1983 requested relief RR-1-9 for inspection of Unit 1 safety injection reducer-to-safe end welds, failure to include this relief in our March 29, 1984 letter was an oversight on our part. The relief request and its evaluation are included as Enclosure 1 to this letter.

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G PDR

Mr. C. W. Fay

- 2 -

With regard to the correct designator for the weld identified as AC-10-RHR-1006-25 in relief request RR-1-5 of August 20, 1982 for Point Beach Unit 1, we have reviewed the associated isometric drawings included in the August 20, 1982 relief request and agree that the correct designator for this weld is AC-10-RHR-1006-8. We consider this to be a typographical error not requiring further review.

Your interpretation of the visual inspection requirements for Point Beach Units 1 and 2 reactor vessel interior surfaces once every three years is correct. That is, during a normal refueling only those areas which are accessible need be visually inspected. However, if, during an outage other than that normally scheduled for this inspection, the fuel is completely removed and other interior surfaces of the reactor vessel become accessible, we expect the visual examination of the reactor vessel which had not been conducted during the previous inspection to be performed.

Sincerely,

Original signed by:

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

Enclosure:
As stated

ORB#3:DL
PKreutzer
8/1/84

Fec
ORB#3:DL
TColburn:dd
8/13/84

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QELB
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K Bachmann
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