

September 25, 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 Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301 LICENSE AMENDMENT NOS. 84 AND 88 INSTRUMENTATION POWER SUPPLIES POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated April 30, 1984 the Commission issued Amendment Nos. 84 and 88 to Facility Operating License Nos. DPR-24 and DPR-27 respectively for the Point Beach Nuclear Plant, Units 1 and 2. These amendments provide limiting conditions for operation relating to instrumentation power supply system equipment upgrades currently under way at Point Beach. These license amendments are to become effective upon completion of equipment installation but not later than December 31, 1984.

As you are aware, we notified the NRC in a letter dated March 5, 1984 that we anticipated completion of the installation of the instrument bus power supply modifications by October 31, 1984 with startup and testing of the system to begin by that date. Subsequently, in letters dated June 26 and June 29, 1984 we established that achievement of the final power supply configuration for the NUREG-0737 instrumentation modification, which requires completion of the instrument bus upgrade, is based on the timely completion of the ventilation and air conditioning (VAC) installation. We acknowledged some problems procuring valves and dampers for the VAC system but stated that we were attempting to resolve these problems and meet the bus upgrade completion schedule.

We presently expect to complete the construction of the instrument bus upgrade by November 30, 1984. This delay is directly related to problems in obtaining necessary VAC system fire and other air system dampers and some cooling (service) water valves without which the battery room ventilation system cannot be

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made operational. Our constructor is procuring the fire and other dampers from Pacific Air Products Company. They are currently scheduled to arrive on site approximately October 26, 1984 and should be able to be installed by November 30, 1984. We have removed the responsibility for purchasing of the problem piping components from our constructor and are expediting delivery of these items or providing for engineering changes to have the cooling system operable on the same schedule.

The purpose of this letter is to request a delay of the effective date of License Amendments 84 and 88 from December 31, 1984 to March 1, 1985. We are requesting this delay in the effective date in order to ensure an adequate startup, testing, and operational checkout period for the VAC system and the new instrument bus power supply equipment (chargers, batteries, and inverters). With the delay in completion of the equipment installation, as noted above, we would only have one month, at best, to conduct the startup and testing of the new equipment. Given the critical and sensitive nature of the instrumentation supplied by the new chargers, batteries, and inverters, we intend to initially operate the new power supply system with a simulated load prior to sequentially switching in actual plant instrumentation channels. Plant instrumentation is particularly sensitive to power supply transients; therefore, we believe extra precautions and a controlled phase-in of first non-vital and then vital loads onto the new system is important to adequately determine the equipment reliability and preclude any unnecessary plant transients or trips. To properly do this transfer during operation we believe it will require sixty days to sequence the loads onto the new system with appropriate hold periods. In addition, some of the equipment for these systems has been on site and in storage for over two years. Initial reenergization of this equipment potentially could result in component failures and must be approached with caution.

The NRC Resident Inspector has notified us that if the new chargers, batteries, and inverters are not in service and operable on January 1, 1985 the revised Technical Specifications will require a shutdown of both units within six hours. Since we cannot accurately predict where we will be in the startup and operational checkout process for the instrument bus upgrade and the consequences of failure to have the system operational to the satisfaction of all parties by the end of the year is significant, we hereby request that the effective date for License Amendments 84 and 88 be revised, by means of new license amendments, to March 1, 1985.

-3- September 25, 1984 Mr. H. R. Denton As required by 10 CFR 50.91 we have evaluated this request for license amendments to the standards of 10 CFR 50.92 to determine whether the requested change involves a significant hazards consideration. Since the requested change involves only an administrative matter and the NRC has previously provided guidance that administrative changes are unlikely to involve a significant hazards consideration, we conclude that delay of the effective date of the subject amendments would not result in a significant hazards consideration. In accordance with 10 CFR 170.12 we are enclosing a check in the amount of \$150 for the application fee since it is our understanding from conversations with our NRC Resident Inspector that a change to a license amendment effective date can only be accomplished by a subsequent license amendment. We have enclosed three signed originals and forty copies of this request. Please contact us if you have any question concerning these matters. Very truly yours, put bull R. W. Britt Attachment (Check No. 808693) Copies to NRC Resident Inspector C. F. Riederer, PSCW Subscribed and sworn to before me this 26th day of September 1984. Notary Public, State of Wisconsin My Commission expires May 4,1986.