



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

February 11, 1985

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. H. Thompson, Director
Division of Licensing

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
RESPONSE TO GENERIC LETTER 84-24
CERTIFICATION OF COMPLIANCE TO 10 CFR 50.49
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On January 14, 1985 Wisconsin Electric Power Company received Generic Letter 84-24, "Certification of Compliance to 10 CFR 50.49, Environmental Qualification of Electric Equipment Important To Safety For Nuclear Power Plants", dated December 27, 1984. This letter requests, within 30 days of issuance, certification under oath or affirmation that compliance with 10 CFR 50.49 is progressing. As discussed with Mr. Colburn of your staff, because of the delayed receipt of this letter we were unable to respond within the specified time frame. Although Mr. Colburn authorized a response extension until the beginning of February, we could not complete this certification prior to this date.

Certification, detailed consistent with the items of Generic Letter 84-24, is provided below:

- a. Wisconsin Electric has in place and is implementing an Environmental Qualification (EQ) Program for Point Beach which satisfies the requirements of 10 CFR 50.49 within the currently approved schedule as clarified below:
 1. All electrical equipment at Point Beach within the scope of 10 CFR 50.49 is installed or being installed within the currently approved schedule.

8502190302 850211
PDR ADDOCK 05000266
P PDR

-1-

A048
1/0

However, a recent internal Nuclear Quality Assurance Division audit of nuclear environmental qualification has identified certain deficiencies in our "Equipment Qualification Summary Sheets" and in documentation of our review and approval of qualification test and analysis reports. We expect to resolve these deficiencies by March 31, 1985. Also, the calculation of accuracy requirements for those instruments to be used in the upgraded Emergency Operating Procedures (EOP's) at Point Beach has not yet been completed. The incorporation of the new EOP setpoints into the EQ documentation will be completed prior to the implementation of the upgraded EOP's scheduled for July 1, 1985. In addition, the audit identified a lack of formality in documentation of maintenance performed to maintain qualification. This, however, was not found to have jeopardized the qualification status of any equipment at Point Beach. Based on our preliminary review of these audit deficiencies, we believe they do not indicate that the installed equipment is not capable of performing its safety function when subject to the design-basis harsh environments.

2. This certification does not apply to Regulatory Guide 1.97 equipment not previously listed in our "Master List of Electrical Equipment to be Environmentally Qualified" provided to you in our November 23, 1983 submittal. The schedule for environmental qualification of any additional Regulatory Guide 1.97 instrumentation or sampling equipment to be qualified is not governed by the schedule provisions of 10 CFR 50.49(g), but rather will be established in the Regulatory Guide 1.97 resolution process.
3. Currently, the NRC has granted us time extensions, until June 7, 1985, for the installation and qualification testing of two items of equipment at Point Beach, i.e., the Crosby lift indicating switch assemblies (LISA's) for direct position indication of the pressurizer code safety valves and the Veam cable connectors for the core exit thermocouples. The June 7, 1985 date is still valid for completion of installation, testing, and documentation on both items. However, due to uncertain nature of qualification testing, it may be necessary to request additional time extensions should testing difficulties arise which cause a delay in our schedule. We will notify you promptly in accordance with 10 CFR 50.49(h) of any problems that might require a further extension of the completion date.
4. Rockbestos cable, which is installed at Point Beach, has several qualification documentation deficiencies identified by the NRC in Information Notice 84-44. Tests by Rockbestos and others

February 11, 1985

indicate that the cable is qualified. Rockbestos, however, is conducting a test program to reverify the qualification of their cable. We are continuing to monitor the test program to ensure that the previous qualification is not invalidated.

- b. There is at least one path to safe shutdown using environmentally-qualified equipment at Point Beach, consistent with the clarification in a.1 above.
- c. All of the equipment within the scope of 10 CFR 50.49, with the exception of the two equipment items discussed in a.3 above, is qualified in accordance with the provisions of that rule, consistent with the clarifications in a.1 and a.2 above. Justifications for continued operation (JCO's) for the Crosby LISA's and Veam thermo-couple connectors were provided in our submittal of November 23, 1983, "Resolution of Safety Evaluation Reports for Environmental Qualification of Safety-Related Electrical Equipment". The JCO's provided at that time remain valid.

Generic Letter 84-24 also requested that the information in IE Bulletin 82-04 and IE Notices 82-11, 82-52, 83-45, 83-72, 84-23, 84-44, 84-47, 84-57, 84-68, and 84-78 be considered when making the above certifications. These documents have been reviewed and, if applicable to Point Beach, have been incorporated in the operating experience program at Wisconsin Electric. This statement is not meant to imply that there is a formal documented mechanism by which all IE Bulletins and Information Notices are analyzed in detail. While we do indeed routinely review such documents, we note that there is no requirement in the regulations for a formal documented review mechanism.

This letter is affirmed in accordance with the provisions of 10 CFR 50.54(f). We would be pleased to respond to any questions you may have in this regard.

Very truly yours,

CW Fay
Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector

Subscribed and sworn to before me
this 11th day of February 1985.

Patricia M. Schlichting
Notary Public, State of Wisconsin

My Commission expires May 4, 1986.