



**Wisconsin Electric** POWER COMPANY

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VPNPD-86-92  
NRC-86-17

February 24, 1986

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

Dear Mr. Denton:

DOCKET NOS. 50-266 AND 50-301  
INSERVICE TESTING PROGRAM  
POINT BEACH NUCLEAR PLANT

We recently received a corporate visit and evaluation by the Institute of Nuclear Power Operations (INPO). One of the areas examined by INPO personnel during these evaluations is licensing and regulatory matters. In the context of this evaluation, the INPO personnel noted that our License Amendment Change Requests Nos. 42 and 58 for the inservice pump and valve testing program, which were filed on February 17, 1977 and November 27, 1978 for Point Beach Nuclear Plant Unit 1 and 2 respectively, had not yet been acted on by the Nuclear Regulatory Commission. Furthermore, since shortly after those filings, we have been required by the NRC to comply with both our existing Technical Specifications and our proposed inservice testing program. In those areas where conflicting requirements arise, we are required to comply with the most restrictive requirements. This direction was most recently reiterated in Mr. James R. Miller's letter dated March 4, 1985. To further complicate matters, we have been required by the Commission's regulations to submit revisions to the inservice testing program for subsequent inspection intervals even though the NRC evaluation of the original submittal has never been completed.

Although we were informed last summer that the NRC expected to complete its detailed review of our inservice testing program and issue the appropriate license amendments by late 1985, this has not occurred. In fact, our contact with the Point Beach Project Manager during this past week seems to indicate that a firm schedule for issuing these license amendments and approval of the Point Beach Nuclear Plant inservice pump and valve testing program still does not exist.

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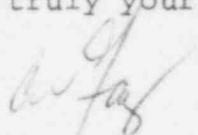
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During our meeting with Mr. Hugh Thompson (then Director-Division of Licensing) on February 5, 1985, the resolution of the inservice inspection program was identified by your staff as a significant licensing issue. We urged Mr. Thompson at that meeting to do whatever could be done to resolve this issue. We again request that you commit the necessary resources and address the policy issues that have been holding up the resolution of this topic. We understand that many other licensees are experiencing this same delay.

Please also be advised that, as a result of this continued delay in NRC action, certain interim relief granted pursuant to 10 CFR 50.59(g)(6)(i) for several inservice testing requirements as identified in Mr. Miller's letter dated March 4, 1985, will expire on February 28, 1986, unless renewed by your staff. In the past, the NRC regional inspectors have taken a strict position on these interim reliefs and have indicated that citations could be issued for improper testing if the relief were allowed to expire. We request that these interim reliefs be extended until the inservice testing program has been approved and the appropriate License Amendments are issued. Mr. Colburn of your staff has advised us that he is working on such an extension. We request that this action be completed before the end of the month.

Very truly yours,



C. W. Fay  
Vice President  
Nuclear Power

Copies to Executive Director of Operations  
U.S. NUCLEAR REGULATORY COMMISSION

NRC Resident Inspector  
Point Beach Nuclear Plant