



Wisconsin Electric POWER COMPANY

231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

(414) 221-2345

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U. S. NUCLEAR REGULATORY COMMISSION
Document Control Desk
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
QUALITY ASSURANCE PROGRAM DESCRIPTION
FINAL SAFETY ANALYSIS REPORT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On June 25, 1987, we submitted proposed changes to the Quality Assurance Program, as described in Section 1.8 of the Point Beach Nuclear Plant (PBNP) Final Safety Analysis Report (FSAR). At that time an exception to ANSI N45.2.9 was proposed in regard to lifetime maintenance and storage of radiographs. During telephone conversations on January 25 and February 2, 1988 between Messrs. R. N. Sutphin and T. E. Vandell, Region III, and Mr. G. M. Krieser, Wisconsin Electric, we were informed that a "blanket" exception to this commitment was unacceptable to the NRC. Accordingly, we are proposing an alternative change to Section 1.8 to take exception to N45.2.9 as follows:

Page 1.8-20, Paragraph 4

This paragraph is changed to read:

Requirements concerning records retention, such as duration, location, and assigned responsibility, are established to be consistent with applicable regulatory requirements. Radiographs, with the exception of those associated with ASME Section XI components or systems (to be retained for the service life of the component or systems), are retained as non-permanent records for a minimum of ten years after the date of the radiograph. In either case, associated radiographic review records are permanently retained and provide necessary weld quality/acceptance information.

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Table 1.8-1, Item 11

Add the following sentence, as previously submitted:

The Point Beach policy for the retention of radiographs and associated review records is outlined in Section 1.8.17.2.

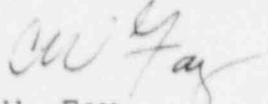
Section 1.8, Table 1.8-1, Item 11 of the PBNP FSAR commits to follow the position of Regulatory Guide 1.88, Revision 1, which endorses and supplements ANSI N45.2.9-1974 and NFPA 232-1970. In these standards radiographs are treated as permanent records. While it is not our intent to commit to more current standards, it is pertinent to note that current standards, including NQA-1 and Regulatory Guide 1.28, Revision 3, do not require the physical evidence of the test, i.e., the radiographic film, to be retained. They only require that a record of review and final results be retained. We believe the more current standards and guidance acknowledge the limited life of radiographs and, therefore, do not require permanent retention. Further, we believe they provide justification for the exception to N45.2.9 being requested.

The technology for nondestructive testing and examination has been substantially improved in the past 20 years. Many inspections originally performed using radiography (RT) are now performed using ultrasonic or eddy current inspection technology. The use of RT has decreased dramatically at Point Beach since original construction due to these advances in alternate inspection methods. Radiographic review records (reader sheets) document the results and acceptability of radiographic examinations. While radiographic examination is performed on a media which lends itself to hard-copy storage more easily than other forms of NDE, our past experience has been that radiographs generally do not provide any more meaningful data than are already provided on the review records.

In view of the above considerations, we believe an exception to lifetime storage and retention of radiographs, other than those associated with ASME Section XI components and systems, is justified. Your approval of this exception is requested.

If you have any questions in regard to the above discussion, please contact Mr. Krieser (414-277-2810).

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Copies to NRC Resident Inspector
NRC Regional Administrator, Region III