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VPNPD-88-491

NRC-88-092

October 7, 1988

Document Control Desk  
U.S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, D.C. 20555

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
IMPLEMENTATION SCHEDULE FOR SEISMIC VERIFICATION  
OF EQUIPMENT IN RESPONSE TO GENERIC LETTER 87-02  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In our letter NRC-87-116 to you dated November 20, 1987, Wisconsin Electric confirmed that we are members of the Seismic Qualification Utility Group (SQUG), which is working closely with the NRC Staff to resolve Unresolved Safety Issue (USI) A-46, Seismic Qualification of Equipment in Operating Nuclear Power Plants. In that letter, we committed to submit a plant-specific schedule for seismic verification of equipment at Point Beach within sixty days of receipt of an NRC Safety Evaluation Report (SER) and resolution of all open issues on the complete Generic Implementation Procedure for Seismic Verification of Nuclear Plant Equipment (GIP) being developed by SQUG. On July 29, 1988, the NRC Staff issued an SER on Revision 0 of the SQUG GIP. The letter to SQUG enclosing the SER requested that SQUG member utilities provide to the NRC, within 60 days, a schedule for implementing the GIP. By correspondence dated August 19, 1988 to Mr. Shao of the NRC staff, SQUG clarified that the sixty days would expire on October 7, 1988. This letter responds to the NRC request for plant-specific seismic verification plans for Point Beach Nuclear Plant, Units 1 and 2, consistent with the requirements of NRC Generic Letter 87-02, "Verification of Seismic Adequacy of Mechanical and Electrical Equipment in Operating Reactors, Unresolved Safety Issue (USI) A-46."

As members of SQUG and the Electric Power Research Institute (EPRI), we have supported the many efforts on which the GIP is based. The SER generally endorses the methodology and criteria embodied in Revision 0 of the GIP, subject to satisfactory resolution of a number of open issues and NRC comments. Action by SQUG, EPRI, and their contractors is underway to resolve the identified open issues and comments in accordance with the

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attached SQUG schedule. This schedule projects completion of Revision 2 of the GIP by April 1989, contingent upon SQUG and NRC agreement on the resolution of various open issues. Revision 2 of the GIP is scheduled to contain all of the information needed to implement the requirements of Generic Letter 87-02 and resolve USI A-46 at SQUG member plants. The final NRC SER on Revision 2 of the GIP is anticipated by May 1989.

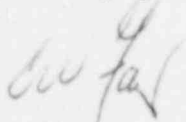
Plans for implementation of Revision 2 of the GIP at Point Beach are necessarily preliminary given the current status of and schedule for completion of the GIP and the final NRC SER. However, it is our current plan to resolve USI A-46 for Point Beach by implementation of the SQUG generic criteria and methodology to be included in Revision 2 of the GIP, as clarified by the SQUG responses to the SER in SQUG letter to Mr. Shao dated September 22, 1988. This plan is based only on the "SQUG Commitments" identified in each section of the GIP. Assuming no major changes in the workscope currently envisioned (as described in Revision 0 of the GIP plus the criteria to be added for cable raceways, tanks, heat exchangers, and relays), we plan to perform the seismic verification plant walkdowns required by Revision 2 of the GIP by the conclusion of the second annual refueling outage for each Point Beach unit after receipt of the final NRC SER and resolution of all open issues. If the final NRC SER with no open issues is issued by May 1989 as scheduled, then the plant walkdown of both units at Point Beach is expected to be completed by about May 1991. Identification of safe shutdown equipment and essential relays, gathering of necessary plant-specific data, and training of our walkdown team members would be initiated in the second half of 1989.

Our current seismic verification implementation plan and schedule, as described above, is contingent on our current understanding of the GIP. If the scope of the final revision of the GIP or the cost and effort required to implement it at Point Beach change significantly from the current anticipated scope and cost estimates, we may re-evaluate our commitments. We also desire to integrate the resolution of numerous other related seismic issues (e.g., Eastern Seismicity, Seismic Design Margins, and Severe Accident Individual Plant External Event Evaluations) with the resolution of USI A-46. In view of the uncertainties in the requirements and schedule for resolution of these related issues, we reserve the right to revise the implementation schedule for resolution of USI A-46 at Point Beach to integrate these potential future requirements into a single, cost-effective program. This possibility for integration has been the subject of on-going discussions with the NRC Staff, and further discussions are planned through the Nuclear Utility Management and Resources Committee (NUMARC). We will advise you in writing of any changes in our implementation plans and schedules.

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We would be pleased to answer any questions you have regarding this matter.

Very truly yours,



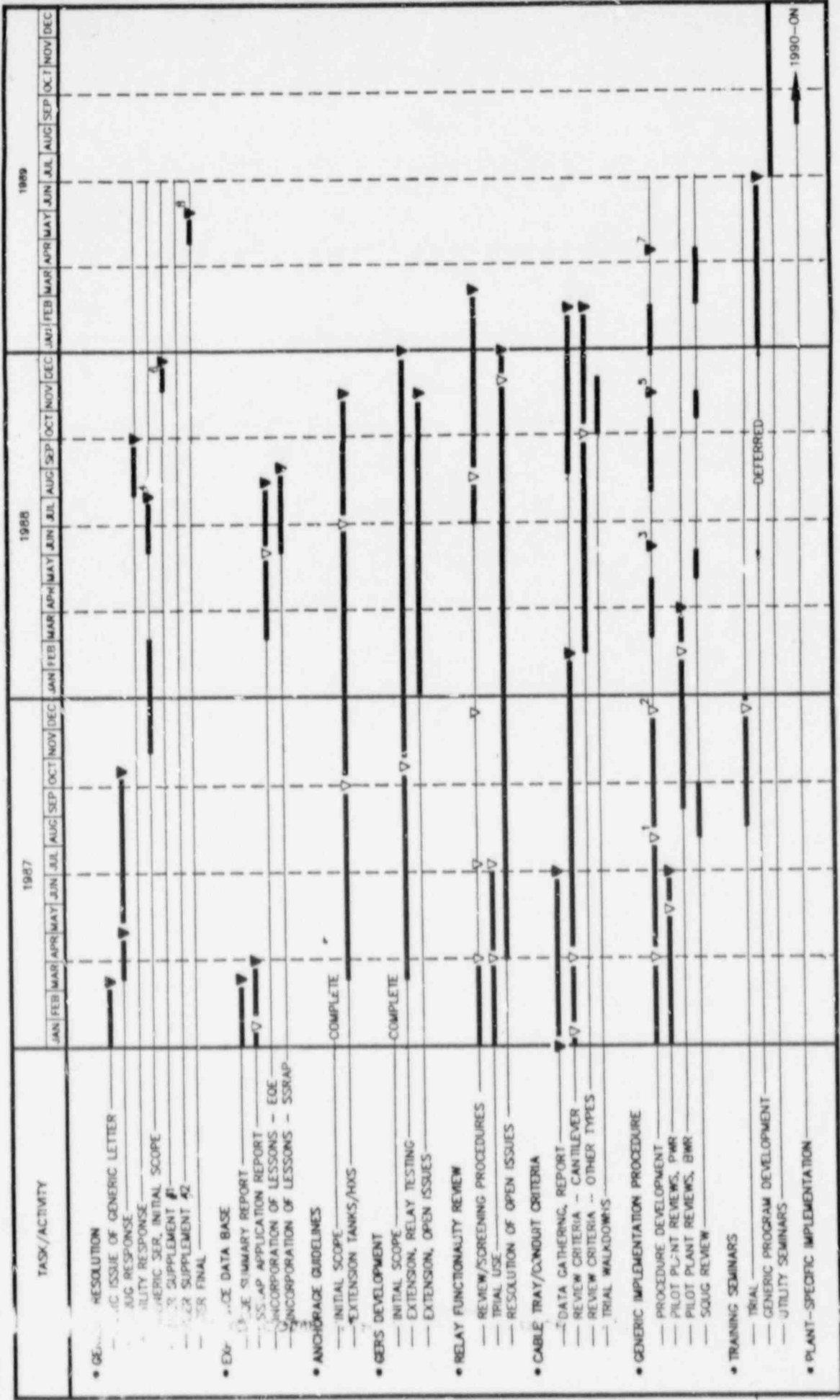
C. W. Fay  
Vice President  
Nuclear Power

Attachment

Copies to NRC Resident Inspector  
NRC Regional Administrator, Region III

WPA ASSESS  
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08/14/87

# SQUG SCHEDULE FOR USI A-46 IMPLEMENTATION



LEGEND:

- DRAFT REPORT
- ▲- FINAL REPORT

NOTES:

1. DRAFT GIP, INITIAL SCOPE
2. DRAFT GIP, INITIAL SCOPE, REVISED FOR TRIAL PLANT WALKDOWN
3. REV. 0 GIP, INCL WALKDOWN LESSONS LEARNED, FINAL ANCHORAGE CRITERIA (EXCL. TANKS/HXs) + COMMITMENTS
4. NRC SER, BASED ON #3

5. REV 1 GIP, ITEM 3 + TANKS/HX, GERs
6. SER ON REV 1 GIP, ITEM 5
7. FINAL GIP, ITEM 5 + RELAYS/CABLE TRAYS
8. FINAL SER