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VPNFD-88-319
NRC-88-053

June 13, 1988

Mr. A. Bert Davis
Regional Administrator, Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Gentlemen:

DOCKETS 50-266 AND 50-301
IE BULLETIN 79-14 OPEN ITEM
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This letter provides a summary of information presented by Wisconsin Electric in a meeting with your staff on June 6, 1988 regarding the IEB 79-14 open item identified during the May 3-5, 1988 special safety inspection at Point Beach Nuclear Plant. Further, it provides our plans for future activities to assess the adequacy of the as-built documentation resulting from the 79-14 program.

Following the identification of the discrepancies between the actual plant installation and a sample of as-built isometrics for Unit 1 during the inspection, we have taken the following actions.

- 1) The impact of the discrepancies on the system code allowable stresses was evaluated either by reanalysis or by inspection. None of the discrepancies resulted in piping stresses in excess of allowables or loads on supports in excess of their capability. The evaluation was completed by May 10, 1988, prior to Unit 1 restart.

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- 2) System walkdown information, which documented the as-built physical configuration of the system as observed by the original walkdown team, was reviewed. Additionally, information documenting the Bechtel analytical and design details of the piping system and supports was reviewed. The conclusions reached from review of this information were:
 - a) The dimensions documented by the walkdown team were generally consistent with those identified during the NRC walkdown of the system; however, this information was apparently not transferred appropriately to the isometric drawing used in subsequent analyses.
 - b) The analytical models for each subsystem were consistent with the isometric used to generate the model. Therefore, the analysts accurately used the information provided to them.
 - c) Although explanations as to how some discrepancies occurred could be developed from the information reviewed, documentation as to the reason for the discrepancy or that the discrepancy was reviewed and reconciled by Bechtel could not be found in all cases.
 - d) A number of discrepancies apparently resulted purely from miscommunication or human error.

- 3) Two more systems inside Unit 1 containment, Isometrics P-140 and P-142 (Emergency Feedwater), and P-148 (Auxiliary Coolant), were walked down by WE personnel for additional information to further evaluate the accuracy of the 79-14 documentation. In these cases, the isometrics reflected much more accurately the as-built configuration of the piping systems. The analytical models were, as expected, consistent with the isometric information.

The reviews identified in Item 3 above suggest that the overall 79-14 program was not subject to generic problems. However, since both acceptable and unacceptable results have been identified on a random basis, we believe it is appropriate to do additional walkdowns of piping systems to further assure that a generic problem does not exist and that the service water system isometrics P-115 and P-138 discrepancies were an isolated case. We, therefore, propose to perform walkdowns of the following systems to collect additional information upon which we can better assess the overall accuracy of the 79-14 program.

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- 1) Isometric P-119, Safety Injection from Pump 15A and B to the Containment Penetrations P-13 and 27, documented by Bechtel Calculation #15-15.
- 2) Portions of Isometric P-132 and P-133, Residual Heat Removal (RHR) Pump P10A and B Discharge to RHR Heat Exchangers HX-11A and B, and bypass line to anchor H-9 on line AC-601R-6 and Containment Penetration P-8, documented by Bechtel Calculation #14-24.
- 3) Isometrics P-215 and P-238, Service Water Supply and Return Inside Containment from Coolers 2HX-15B and D to Containment Penetrations P-39, 40, 47, and 48. These are the comparable isometrics in Unit 2 to those walked down in Unit 1 during the NRC inspection and are documented by Bechtel Calculations #7-16, 17, 24, and 25.
- 4) Isometric P-239 and P-242 Emergency Feedwater Inside Containment, documented by Bechtel Calculation #2-13 and #2-14.
- 5) Isometric P-248, Auxiliary Coolant Inside Containment, documented by Bechtel Calculations #14-19 and #15-17.

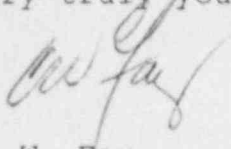
The walkdowns for Items 1 and 2 are currently scheduled for the week of June 20, 1988. Items 3-5 will be walked down during the Unit 2 outage scheduled to begin in early October 1988. With the information from these walkdowns, we will be in a better position to reach a conclusion as to the overall accuracy of the 79-14 documentation provided to us by Bechtel. We will provide a written update of the results following the inspections performed this month and the Unit 2 containment walkdowns this fall.

We anticipate that the information collected will support our contention that the 79-14 walkdowns, analyses and documentation, in general, adequately demonstrate the acceptability of the as-built piping systems and document the as-built configurations.

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If you have any questions or wish to have a representative of your staff participate in or witness any of the walkdowns identified above, please contact me.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Copies to NRC Resident Inspector
NRC Document Control Desk

