

231 W Michigan, PO. Box 2046. Milwaukee. WI 53201-2046

(414) 221-2345

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Ladies/Gentlemen:

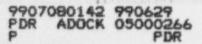
DOCKETS 50-266 AND 50-301 RESELECTION OF CONTROL TENDONS IN THE POINT BEACH CONTAINMENT STRUCTURES POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This letter serves to document a conference call with Hansraj G. Ashar of the NRC staff during which Wisconsin Electric discussed its intentions and basis for reselection of the control tendons in the Point Beach containment structures. Point Beach is currently completing the 28th year tendon surveillance during the summer of 1999.

Point Beach Technical Specification 15.4.4 and Regulatory Guide 1.35, Revision 3 (Paragraph 2.4) state "to develop a history and to correlate the observed data, one tendon from each group should be kept unchanged after the initial selection, and these unchanged tendons should be identified as control tendons." Point Beach has interpreted the term "unchanged tendons" to mean that the selected control tendons should remain the same designated control tendons throughout performance of all tendon surveillances. We have also interpreted the intent of above Revision 3 of Regulatory Guide 1.35 statement to indicate that these control tendons should be left unchanged physically, meaning unaltered from initial installation and never retensioned.

However, Point Beach had retensioned all of the examinent tendons during the 1st, 3rd, and 8th year tendon surveillances as recommended by earlier revisions of Regulatory Guide 1.35. Therefore, the tendons that Point Beach has been using as controlled tendons have been detensioned and subsequently retensioned.

Wisconsin Electric believes that use of retensioned tendons as control tendons does not allow for developing a proper relaxation history and correlation of observed data with projected trends as intended by Point Beach Technical Specifications. Therefore, Point Beach has elected to designate new control tendons, which have not been retensioned in the past. This designation was discussed with Hansraj G. Ashar of the NRC staff. Since all of the tendons that were examined during the first three surveillances were retensioned, Point Beach designated new control tendons that have not been examined and therefore retensioned during the first three surveillances. This designation of new control tendons will assure that during the remaining surveillances the data obtained from the surveillances will



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allow the development of a proper relaxation history and correlation of observed data with projected trends as intended by Point Beach Technical Specifications. The designation of new tendons was evaluated in accordance with 10 CFR 50.59 and found to not involve an unreviewed safety question.

The new control tendons were selected to be in close physical proximity to the former common tendons in each group (two away from the previous common tendon) to maintain the approximate symmetry of the former common tendon set. This will also facilitate performance of the surveillance by allowing continued use of existing permanently installed platforms that were built to allow access to the former common tendons. Examination of these new common tendons will start with the 28th year tendon surveillance now in progress. Point Beach believes that selecting new common tendons ensures meeting the intended requirements of Regulatory Guide 1.35, Rev. 3, and the Technical Specifications.

If a new common tendon is found to need retensioning, another nearby tendon will be selected as the common tendon in that group to ensure the continued useful relaxation history as intended by Regulatory Guide 1.35, Rev.3.

The New Common Tendons are as follows:

Unit 1

Former Common Tendon	New Common Tendon
BF-23	BF-25
V-3	V-5
D2-23	D2-25

Unit 2

Former Common Tendon	New Common Tendon
MH-54	MH-56
V-339	V-337
D2-227	D2-229

There are no new commitments in this letter. Please contact us if you require additional information.

Sincerely,

Mark P. Findlay, Ph.D. Manager, Regulatory Services & Licensing

JEK/tat

cc: NRC Regional Administrator NRC Resident Inspector NRC Project Manager PSCW