



**Wisconsin  
Electric**  
POWER COMPANY

Point Beach Nuclear Plant  
6610 Nuclear Rd., Two Rivers, WI 54241

(920) 755-1321

NPL 97-0803

December 19, 1997

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

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301  
VERIFICATION OF SEISMIC CLASS PIPING SYSTEM INTERFACES  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter to the Commission dated July 25, 1997, we documented actions being taken by Wisconsin Electric Power Company in response to the identification of cases where the boundary between Seismic Class I and lower class portions of piping systems are not in strict conformance with Final Safety Analysis Report (FSAR) criteria. The actions have been discussed in detail during conversations between the NRC and licensee Staff during the period of July 16, 1997 through July 18, 1997.

Our July 25, 1997, letter identified three previous instances where we were not in strict conformance with the Point Beach Nuclear Plant (PBNP) updated FSAR Appendix A criteria for "Seismic Design Or Verification for Structures And Equipment." These three instances have been documented via LERs 50-301/92-002-00, 50-266/97-021-00 and 50-266/97-028-00. The letter also detailed a program for verifying and ensuring conformance with the plant design and licensing basis for safety-related seismic class piping system boundaries.

The purpose of this letter is to provide a status update on program activities and to revise the action plan commitments and completion dates previously submitted on July 25, 1997.

Verification of Seismic Adequacy of RWST/SFPC Recirc Loop: We committed to evaluate the seismic adequacy of the refueling water storage tank (RWST)/spent fuel pool cooling (SFPC) recirculation loop piping and complete any required modifications to bring the system into compliance with the current licensing basis (CLB) by December 31, 1997.

Nine detailed piping/support stress analyses are currently under preparation to address the CLB compliance for the RWST/SFPC recirculation loop and its cross-connections to various other systems. Completion of this work has taken longer than anticipated due to the impact of emergency work associated with the auxiliary feedwater system and restart issues that have affected both units.

9712240190 971219  
PDR ADOCK 05000266  
P PDR



ADD 1/0

Our revised schedule for this work is:

- Preparation and review of the piping/support stress analyses will be completed by February 28, 1998.
- Installation of support modifications will be completed four months following completion of the upcoming U1R24 refueling outage.

Verification of Seismic Class Piping System Interfaces: Our letter to the Commission of July 25, 1997, outlined a program to systematically verify and ensure conformance of seismic class interfaces with the CLB.

The program was established to determine what the original Bechtel/Westinghouse seismic boundary design criteria was; to apply this criteria to the existing system piping and instrument diagrams to identify the appropriate seismic class boundaries and associated interface requirements; to consult with system engineering and operations to identify potentially inappropriate boundary designations based on present system operation; and to perform system walkdowns of inappropriate boundary designations to determine the impact on system operability by December 31, 1997.

Based on the above program, a schedule would be developed to ensure that all nonconformances are evaluated by detailed Code compliance analyses commensurate with their importance to safety and operability by June 30, 1998. Identified modifications were intended to be installed in accordance with the guidance delineated in Generic Letter 91-18.

A copy of the original piping and instrument diagrams that were marked up for seismic class interfaces by Westinghouse and subsequently transmitted to Bechtel has been obtained and reviewed. The marked-up drawings basically documented which systems were Seismic Class I on a generic basis, but did not generally call out specific physical locations where the seismic boundary change occurred, such as at a specific valve or anchor.

Since the original mark-ups did not, in general, indicate specific physical interface locations, a set of the original Revision 0 drawings was reviewed. These drawings contained the original specific seismic class boundaries. A comparison of the Revision 0 drawings to the current drawings has been completed. A database has been compiled of all current seismic class interfaces for piping systems at Point Beach. This database will be used to verify the operational status (open or closed valve position at all interfaces) of all the seismic class boundaries.

Several action items remain to be completed to verify the status of all the interfaces. This effort will determine whether any outstanding inappropriate boundary classifications exist, and will require support from system engineering and operations. The original program intended that the review by system engineering and operations (and any subsequent operability evaluations for inappropriate boundary classifications) be completed by December 31, 1997.

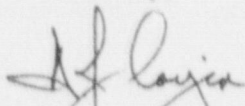
Due to the emergent issues described earlier and limited availability of experienced industry personnel to assist in resolving this issue, the original commitment date will not be met. The following schedule has been developed to complete resolution of this issue:

- A schedule will be developed to systematically review all valves in the seismic interface database by February 28, 1998. The valves will be scheduled for review based on their probabilistic safety assessment safety significance.
- Valve reviews and CLB conformance assessments, commensurate with the above schedule, will be completed by January 21, 1999. Boundary classifications that are not in conformance with the CLB will be evaluated for system operability.
- Once identified, all inappropriate boundary classifications will be scheduled for detailed Code compliance evaluations commensurate with their importance to safety and operability of the system. Needed modifications required to restore the affected systems to compliance with the CLB will be installed in accordance with guidance established via Generic Letter 91-18.

We believe this program is responsive to the identified concerns. This program will ensure that Point Beach is operated and maintained in accordance with its design and licensing basis for seismic class piping system boundaries. We will communicate the installation schedule for any identified modifications to the Commission. We will keep you informed of our progress, issues identified and corrective actions taken.

Please contact us if you have further questions or desire additional information.

Sincerely,



A. J. Cayia  
Plant Manager  
Point Beach Nuclear Plant

cc: NRC Regional Administrator  
NRC Resident Inspector  
PSCW