Wisconsin Electric
POWER COMPANY

Point Beach Nuclear Plant
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NPL 97-0693

10 CFR 50.4
10 CFR 50 Appendix R

November 5, 1997

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

Ladies/Gentlemen:

DOCKETS 50-266 AND 50-301
PERFORMANCE TESTING OF TEMPORARY
APPENDIX R VENTILATION EQUIPMENT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In Point Beach Nuclear Plant Licensee Event Report LER 266/97-020-00, Wisconsin Electric committed to procure portable ventilation equipment, store it in appropriate plant locations, and develop plant procedures that would direct the use of this equipment to provide supplement cooling for essential equipment rooms during Appendix R fire scenarios. This equipment has been procured, stored appropriately, and tested to verify its operation. Also, a design calculation was prepared to confirm that the ventilation fans and flexible ductwork will provide adequate ventilation in the non-fire areas, such as the cable spreading room to ensure equipment operability for achieving the Appendix R safe shutdown.

In a telephone conference on August 21, 1997, and documented in our letter dated August 27, 1997, we proposed to conduct a test in the cable spreading room to verify the air flow rate(s) assumed in the design calculation. During the performance test, the normal ventilation was to be secured and the flow rate(s) from the flexible ductwork was to be measured. We planned to use the test data to provide a qualitative demonstration that the air distribution provided by the portable ventilation system would provide adequate flow to ensure equipment operability.

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As a preparatory measure to generally verify the planned test method, we performed a test of this equipment on October 10, 1997, in Point Beach Nuclear Plant Warehouse 3. The portable ventilation equipment, including fans, flexible ductwork, and a portable generator were arranged to verify achieveable air flow rates. During this simulated test, the recorded air flow rates through the ventilation equipment were less than the values assumed in the original calculation of post-fire room temperature conditions.

Although the Warehouse 3 simulated configurations do not accurately simulate the cable spreading room, we conservatively applied the test results to the design calculation. As a result of the lower than expected air flows, Condition Report 97-3293 was initiated. On October 10, 1997, an operability determination concluded that, at the reduced capacity, the ventilation equipment would still limit room temperatures such as the cable spreading room to levels that would ensure the operability of safe shutdown equipment.

After completion of our planned performance test in the cable spreading room test, the as found flow rates will be verified to be bounded by the operability determination or a calculation will be performed to ensure that the as tested flow rates will provide adequate flow rates to limit the room temperatures as discussed above.

While planning the cable spreading room ventilation test, we discovered that conducting the test with a unit at-power may constitute an unreviewed safety question (USQ) pursuant to 10 CFR 50.59. The test process would require that the cable spreading room doors be blocked open with ductwork impeding their closure. The 10 CFR 50.59 safety evaluation determined that the probability for equipment malfunction may increase in the event of a high energy line break (HELB) with the doors blocked open. Therefore, it is not practical that we conduct the prescribed cable spreading room test at-power.

We have identified an opportunity in the plant schedule to conduct this test when neither unit has sufficient energy to generate a HELB. This opportunity is expected to occur during our planned shutdown of Unit 2 and restart of Unit 1 currently planned to occur in late November. Therefore, we propose to modify our current October 31, 1997, commitment date, such that the prescribed test will be conducted in late November or December, 1997. This date may vary based on changes to the plant outage schedule. We will keep the NRC advised if this projected date should change significantly.

If you have any questions with our revised course of action, please contact us.

Sincerely,

Douglas F. Johnson
Manager,
Regulatory Services & Licensing

JEK/lad

cc: NRC Resident Inspector
NRC Regional Administrator