Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

(414) 221-2345

O&O

PRIORITY ROUTING

First		Second
RA		RC
DRA		EIC
DRP		SGA
DRS		L
DRSS		OL
DRMA		OI
		PAO

FILE

Orig +1

VPNPD-87-209
NRC-87-54

May 15, 1987

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

Gentlemen:

DOCKETS 50-266 AND 50-301
USE OF AMP SPLICES WITH
ENVIRONMENTALLY QUALIFIED COMPONENTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Mr. Gautam requested that Wisconsin Electric provide information regarding the use of potentially unqualified AMP splices with environmentally qualified (EQ) components at Point Beach. As a result of our review of IE Information Notice 86-104, "Unqualified Butt Splices Connectors Identified in Qualified Penetrations," we determined that there was a possibility that AMP Special Industries Nuclear Pre-Insulated Environmentally Sealed Splices, PVF_2-insulated Part 52980 or 52979, were used to splice the pigtails of some environmentally qualified ASCO solenoid valves to an extra length of field cable inside the connecting flexible conduit. Although these AMP splices were not the nylon-insulated butt splices referenced in IE Information Notice 86-104, the environmental qualification of the splices was not properly documented in accordance with our EQ administrative procedures. An internal non-conformance report (NCR) was, therefore, written to document this potential EQ deficiency. We believe that no other EQ components at Point Beach have used AMP Splices.

IE01
1/1

MAY 19 1987

A justification for continued operation (JCO) (copy attached) was prepared as part of the NCR evaluation. This JCO documents that the failure of the AMP splices would not compromise the operability of the associated solenoid valves. These solenoid valves are de-energized and fail safe to perform their safety function in all cases. These splices, therefore, have no safety function to perform during a design basis accident. The splices have been included in our EQ master list to help ensure that capabilities exist for post-accident sampling, venting of the reactor coolant system through the pressurizer PORV's, or emergency contingency actions beyond the design basis of the plant. Based on this JCO, we believed that the solenoid valves were operable per the Point Beach Technical Specifications, and that the potential deficiencies were not reportable in accordance with 10 CFR Part 21 or Part 50.72 or 50.73.

An inspection of splices associated with all EQ solenoid valves on both units at Point Beach has recently been completed in accordance with the NCR. On Unit 2 no unqualified splices were identified. The Unit 1 inspection identified five solenoid valves using AMP splices, and these splices have been replaced with qualified splices.

If you have any questions on the above information, please contact Mr. R. K. Hanneman of my staff (441-221-2009).

Very truly yours,

C. W. Fay
Vice President
Nuclear Power

Attachment

Copies to NRC Document Control Desk
NRC Resident Inspector

Justification for Continuing Operation

Amp Splices on ASCO NP-1 Solenoid Valves

The attached list are the ASCO NP-1 solenoid valves that may have been installed with Amp splices as opposed to the environmentally qualified Raychem WCSF-N splices. Use of the Amp splices could render the environmental qualification of these solenoid valves indeterminate.

The solenoid valves listed perform the following functions:

a) Containment isolation
b) Pressurizer PORV operation
c) Sample line isolation
d) Feedwater line isolation

The air-operated valves, which these solenoid valves serve, will fail in the closed position upon loss of pneumatic pressure or electrical power. In the case of item a) this is not a problem as the safety function is performed early in the accident (<10 sec.), and subsequent failure of these valves will have no effect upon the status of the containment isolation valves. Item b) will not reduce safety as the PORV's perform no safety related function. Failure of the PORV solenoid will only result in the closure of the PORV. The PORV block valves will provide RCS pressure boundary integrity. The sample lines are required for Regulatory Guide 1.97 Post-Accident Monitoring, which is not a safety function. The only safety function of these valves is to provide containment isolation for the sample lines. Therefore item c) is not a safety problem. Finally the feedwater line isolation is accomplished by closure of the feedwater regulating valves, and the bypass valves upon receipt of an SI signal. Failure of the solenoids to these valves due to accident environmental conditions will result in the subject valves failing closed. As this is the safety function of these valves (close on an SI signal), item d) is no problem. Based on the above justification, there is no significant impact on the safety of the plant due to the possible use of unqualified Amp splices and/or extension cable.

EQMR: ASCO NP-1 Solenoid Valves

Tag No(s). Affected:

1-CV1296	2-CV1296
1-CV313A	2-CV313A
1-CV371A	2-CV371A
1-HV3213	2-HV3213
1-HV3245	2-HV3245
1-HV3200C	2-HV3200C
1-IA3047	2-IA3047
1-IA3048	2-IA3048
1-SV466C	2-SV466C
1-SV466D	2-SV466D
1-SV476C	2-SV476C
1-SV476D	2-SV476D
1-SV480	2-SV480
1-SV481	2-SV481
1-RC430	2-RC430
1-RC431C	2-RC431C
1-SV951	2-SV951
1-SV953	2-SV953
1-SV955	2-SV955
1-SV959	2-SV959
1-SV966C	2-SV966C
1-CV5958	2-CV5958
1-CV5959	2-CV5959