



Wisconsin Electric POWER COMPANY
231 WEST MICHIGAN, MILWAUKEE, WISCONSIN 53201

July 3, 1981



Mr. J. G. Keppler, Regional Director
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
FURTHER RESPONSE TO IE BULLETIN 79-14
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

IE Bulletin 79-14 requires licensees to verify that the as-built safety-related piping systems conform to the as-designed seismic analysis and acceptance criteria. This letter provides a progress report on our program in response to the items in the Bulletin. This report is our eighth submittal regarding Bulletin 79-14 and supplements our previous responses.

Significant events and the current status of our program are as follows:

1. The number of piping isometric drawings has increased to 129 from 121. The additional isometrics are related to service water piping inside containment from the service water headers to the containment cooling heat exchangers. This piping is inaccessible during plant operation. Isometric drawings of the Unit 2 piping were developed and the piping was inspected during this past refueling outage. The piping was judged to be capable of performing its function in the event of a seismic occurrence before Unit 2 was returned to service following the outage. The piping is presently in the detailed analysis stage.

The comparable Unit 1 piping will be inspected during the scheduled July 1981 outage.

2. For the previously reported 121 isometric drawings, all have been analyzed at least once and necessary corrections have been issued to the field.

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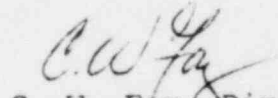
3. As of June 15, the physical corrections were about 64% complete.
4. On May 7 and 8, Mr. I. Yin of Region III conducted a followup inspection of our program in the San Francisco offices of Bechtel Power Corporation. The results of the inspection are contained in NRC Report Nos. 50-266/81-09 and 50-301/81-10 which were transmitted to us by Mr. E. C. Norelius' letter of May 19, 1981. During this inspection, all previous questions were satisfactorily resolved and no items of noncompliance or unresolved issues were identified.

As part of our Bulletin compliance program, we are also re-evaluating all affected containment penetrations. The original design of these penetrations is discussed in Volume 2, Section 5 of the PBNP Final Facility Description and Safety Analysis Report (FFDSAR). The FFDSAR implies that the ASME Code general membrane stress allowable (S_m) was used for the combined stresses from pipe loads, pressure loads, dead loads, and seismic loads. However, for the current evaluations, the primary local membrane stress plus the bending stress is being determined. Accordingly, the stress allowable has been established as $2.25 S_m$ which complies with the current ASME Code. The procedure (Bechtel Procedure P-503) for performing this evaluation was reviewed and deemed adequate during the May 1981 NRC Region III inspection noted earlier.

With respect to Item 4D of the Bulletin pertaining to documentation, it is our intention to incorporate a listing of the applicable pipelines, and corresponding isometric drawings, into the Point Beach Quality Assurance Manual Volume II for additional control and future reference. This listing will be an updated version of the Appendix A listing contained in our August 1, 1979 submittal. Also, we are in the process of revising the PBNP modification procedure to more clearly identify the need for evaluation of the applicable seismic design requirements.

At this time we estimate that our program, except for final documentation and possible delivery of some equipment, will be completed by the end of this year. Accordingly, we anticipate that our next report will be submitted in December 1981. If you require any additional information at this time, please contact us.

Very truly yours,



C. W. Fay, Director
Nuclear Power Department

Copies to: Office of Inspection and Enforcement
Division of Reactor Operations Inspection
Mr. A. Schwencer, Chief
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NRC Resident Inspector