



Wisconsin  
Electric  
POWER COMPANY

231 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201

(414) 221-2345

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U. S. NUCLEAR REGULATORY COMMISSION  
Document Control Desk  
Mail Station Pl-137  
Washington, D. C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
1790 PUMP AND VALVE INSERVICE TEST PROGRAM  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In our letter dated December 21, 1990, transmitting our inservice testing program for the third inspection interval, we discussed the difficulty of having all implementing procedures in place for certain systems and components added to our program in response to Generic Letter 89-04. We indicated a delay until April 30, 1991, in having all implementing procedure changes and new implementing procedures in place due to special testing and system modification requirements.

The rewrite of our IST program required that eighteen additional pumps be tested and that 329 valves be added or tested differently than in the previous program. As of April 5, 1991, thirty-one procedure changes were complete and available for use. An additional twenty-one changes had the technical input complete and were in clerical production or the administrative review and approval process. We expect to complete the approvals for these procedures by June 1, 1991. Four systems were identified as needing to be added to the IST program. The implementing procedures necessary to accomplish this have not yet been established due to technical difficulties that have been encountered. The systems are CVCS-Charging, CVCS-Boric Acid Transfer, ESF HVAC, and Component Cooling Water. The following difficulties have been encountered:

- a. The need for a system modification to install test connections in the Component Cooling Water System to do valve leak through testing has been identified. Without the modification, large quantities of chromate-treated water would need to be transported around the plant using temporary means. This is an unsafe practice. Handling for reuse is necessary because chromated water cannot be effectively processed or disposed of. A modification to accomplish these changes will be evaluated by June 1, 1992.

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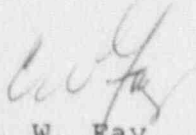
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- b. As we removed insulation from HVAC systems to get a better look at the actual equipment, we found valves which get their motive force from the refrigerant of the chillers, as opposed to the plant process air as was previously thought. We also identified the need for additional isolation valves and controlled vents. We have yet to identify how these valves will be fail-safe position tested. An engineering work request to evaluate ways to test the valves will be completed by March 1, 1992.
- c. The boric acid transfer pumps move 12% boric acid solution which is kept at 150°F to prevent crystallization. In order to obtain pump performance data, encapsulating insulation needs to be removed. This could lead to heat tracing damage and boric acid crystallization. This would cause Technical Specification equipment to be inoperable. Physical modification of the insulation may be needed. A modification to change the insulation will be evaluated by June 1, 1992.

We intend to continue to resolve these technical difficulties in accordance with the revised schedule outlined above. It is possible that additional requirements will be identified which may change our expected schedule. If this occurs, we will inform you of any necessary changes. Schedules will be established for modification work identified by the evaluations discussed above. We will inform you of these schedules after they are developed.

Please contact us if you have any questions.

Very truly yours,

  
C. W. Fay  
Vice President  
Nuclear Power

TGS/dpg

Copies to Resident Inspector

Regional Administrator - Region III