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

November 20, 1978

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. Charles Trammell, Project Manager
Operating Reactors Branch #1

Gentlemen:

DOCKET NO. 50-266
WITHDRAWAL OF RELIEF REQUESTS
FOR CERTAIN PUMP TESTS
INSERVICE TEST PLAN
POINT BEACH NUCLEAR PLANT, UNIT 1

Our Inservice Inspection Program for safety class components was transmitted to you by letter dated May 20, 1977. During recent telephone discussions of the pump testing program between Messrs. Hossford and Trammell of the Nuclear Regulatory Commission and Messrs. Rhodes and Gross of Wisconsin Electric Power Company, it became apparent that some of the requests for relief contained in the program were not necessary. The purpose of this letter is to withdraw those unnecessary requests for relief.

The testing program at Point Beach Nuclear Plant is in conformance with Section XI of the 1974 Boiler and Pressure Vessel Code with addenda through Summer 1975. This Code provides that for pump testing in piping loops with a fixed hydraulic resistance, it is necessary to measure either flow rate or differential pressure across the pump, but not both. The requests for relief that are being withdrawn involve the dual requirements of measuring flow rate and differential pressure in fixed resistance piping loops. They are as follows. The numbering conforms to the test plan.

2. P10A&B, Residual Heat Removal Pumps

Pressure taps have been added such that suction pressure can be measured. We are deleting the relief request. "1. Relief is requested for suction pressure and differential pressure measurement . . . " Also deleted is the additional testing statement which now is not necessary.

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3. P14A&B, Containment Spray Pumps

As was discussed in the telephone conversation, since it is an either/or situation, it is not necessary to request a waiver on flow rate if a waiver is requested on differential pressure. Therefore, we are deleting the relief request "2. Relief is requested from the flow rate measurement . . . "

4. P29, Turbine Driven Auxiliary Feedwater Pump

Since differential pressure is measured, we are deleting the relief request "1. Relief is requested from the required flow rate measurement . . . " Also deleted is the additional testing statement which is not necessary.

5. P38A&B, Electrically Driven Auxiliary Feedwater Pumps

Since differential pressure is measured, we are deleting the relief request "1. Relief is requested from the required flow rate measurement . . . " Also deleted is the additional testing statement which now is not necessary.

The Winter 1976 Addenda to Section XI of the ASME Boiler and Pressure Vessel Code changed the requirements for running the pumps tests. If Addenda to the Code of Winter 1976, or more recent are approved, many of the requests for relief withdrawn by this letter will have to be reinstated.

Ten copies of revised pages of the test plan are attached for information. Withdrawal of these requests for relief is not sufficient to issue a formal revision to the test plan, but if a revision is issued in the future for other purposes, these changes will be included.

Very truly yours,

Sol Burstein

Executive Vice President

Attachments

SECTION 1

PUMP AND VALVE PERIODIC TESTS

PUMP AND VALVE TESTING PROGRAMS

Part 1 - Pump Testing

This section lists those nuclear safety related pumps which make up the Point Beach Nuclear Plant Unit 1 inservice pump testing program. The function, code classification, test parameters to be measured, test intervals, additional testing, and specific relief requested from the ASME Section XI requirements are listed for each of the pumps to be tested in accordance with this program. Relief from those ASME Section XI requirements identified herein as impractical is requested.

1. P15A&B, High Head Safety Injection Pumps

Function: High head safety injection

Code Class: ASME Section III, Code Class 2

Test parameters to be measured:

This is a fixed resistance system test

1. Discharge pressure
2. Bearing temperature (measured annually)
3. Test line flow rate
4. Vibration amplitude
5. Fluid temperature

Test Intervals: Monthly during periods when the plant is above cold shutdown conditions.

Relief from impractical ASME Code Section XI requirements:

1. Relief is requested for the requirement for suction pressure and differential pressure measurement. This pump is operated with a constant suction head, the refueling water storage tank (RWST). The RWST level is maintained at essentially 99% in accordance with Section 15.3.3 of the Technical Specifications and there is no practical value in measuring a constant suction pressure.

Additional Testing: Once a year during refueling a full flow test is conducted while the refueling cavity is being filled. This test allows a head flow curve verification to be made at higher flow rates.

2. P10A&B, Residual Heat Removal Pumps

Function: Low head safety injection

Code Class: ASME Section III, Code Class 2

Test parameters to be measured:

This is a fixed resistance system test

1. Discharge pressure
2. Suction pressure
3. Bearing temperature (measured annually)
4. Vibration amplitude
5. Fluid temperature

Test Intervals: Monthly during periods when the plant is above cold shutdown conditions.

Relief from impractical ASME Code Section XI requirements: None

Additional Testing: There are no additional tests which are considered necessary.

3. P14A&B, Containment Spray Pumps

Function: Containment depressurization

Code Class: ASME Section III, Code Class 2

Test parameters to be measured:

This is a fixed resistance system test

1. Discharge pressure
2. Bearing temperature(measured annually)
3. Vibration amplitude
4. Fluid temperature

Test Interval: Monthly during periods when the plant is above cold shutdown conditions.

Relief from impractical ASME Code Section XI requirements:

1. Relief is requested for the requirement for suction pressure and differential pressure measurement. This pump is operated at a constant suction head, the refueling water storage tank (RWST). The RWST is maintained at essentially 99% in accordance with Section 15.3.3 of the Technical Specifications and there is no practical value in measuring a constant suction pressure.

Additional Testing: There are no additional tests which are considered necessary.

4. P29, Turbine-Driven Auxiliary Feedwater Pumps

Function: Steam generator auxiliary feedwater

Code Class: ASME Section III, Code Class 3

Test parameters to be measured:

This is a fixed resistance system test

1. Discharge pressure
2. Suction pressure
3. Turbine RPM
4. Bearing temperature (measured annually)
5. Vibration amplitude
6. Fluid Temperature

Test Interval: Monthly during periods when the plant is above cold shutdown conditions.

Relief from impractical ASME Code Section XI requirements: None

Additional Testing: There are no additional tests that are considered necessary.

5. P38A&B, Electrically-Driven Auxiliary Feedwater Pumps

Function: Steam generator auxiliary feedwater

Code Class: ASME SEction III, Code Class 3

Test parameters to be measured:

This is a fixed resistance system test

1. Discharge pressure
2. Suction pressure

3. Bearing temperature (measured annually)

4. Vibration amplitude

5. Fluid temperature

Test Interval: Monthly during periods when the plant is above cold shutdown conditions.

Relief from impractical ASME Code Section XI requirements: None

Additional Testing: There are no additional tests that are considered necessary.

6. P32A, B, C, D, E & F, Service Water Pumps

Function: Provide vital cooling water

Code Class: ASME Section III, Code Class 3

Test parameters to be measured:

1. Discharge pressure

2. Circulating water forebay level

3. Vibration amplitude

4. Fluid temperature

Test Intervals: At least monthly. The two running pumps are normally tested every two weeks. Then the pumps are shifted to the preferred pumps for the next two weeks' period and they are tested.

Relief from impractical ASME Code Section XI requirements:

1. Relief is requested for the requirement of differential pressure measurement. The forebay level is measured with each test and it will enable any variation in discharge pressure which is caused by forebay level changes to be explained.

2. Relief is requested for the requirement of measuring bearing temperature. These pumps are vertical, water-lubricated pumps and bearing temperature is not accessible.

3. Relief is requested for the requirement to measure flow. The measurement of discharge pressure will allow pump wear to be evaluated. The redundancy provided (six pumps with only four required) will insure required capacity at all times without installing flow instrumentation.

Additional Testing: There are no additional tests which are considered necessary.

Part 2 - Valve Testing

This section lists the nuclear safety related valve testing requirements which make up Point Beach Nuclear Plant inservice valve testing program. This section is divided into four subsections. They are:

A. Category A Valve Leak Testing Requirements

B. Category A & B Valve Testing Requirements

C. Category C, D, and E Valve Testing Requirements

D. Valve Testing Requirements Determined to be Unpractical