



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

February 21, 1983

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

Attention: Mr. R. A. Clark, Chief  
Operating Reactors Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
NUREG-0737 ITEM II.B.3  
POST ACCIDENT SAMPLING SYSTEM  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This is in response to your letter of December 22, 1982 in which you requested certain additional information concerning our Post Accident Sampling System.

1. Training

All chemistry technicians are trained in the operation of the primary coolant post accident sampling system on an annual basis. Training is conducted in pairs, and the individuals actually obtain a sample with the system and carry out an analysis. Results of their analysis are compared with the results obtained by others during the same day in the course of routine sampling analysis via the normal sampling system. Training of these pairs of individuals is spread over the year so that, in fact, the Post Accident Sampling System is actually operated a number of times during any annual period.

2. pH Analysis

At Point Beach, pH measurements are made with an Orion 901 pH meter, using a combination electrode. Prior to use, the instrument is calibrated using two appropriate buffers which span the anticipated range of pH measurements to be made.

A046

February 21, 1983

The pH determinations are made on undiluted samples. Results obtained in the course of post accident sampling and analysis training are compared with those obtained for the normal, routine sample for the same day. Our experience has thus far indicated agreement within 0.09 pH units.

3. Standardized Test Matrix

Reconfirming our earlier commitment, the standardized test matrix will be completed by April 1, 1983. As requested in your December 22 letter, the results will be submitted to you within 30 days of completion. As stated in our earlier submittal, we prefer not to perform the induced radiation field portion of the test because of ALARA concerns. Since pH analysis is best performed on an undiluted sample, we suggest that NRC prepare guidance on pH meter readings in high radiation fields in lieu of requiring each licensee to make an individual experimental determination.

4. Heat Tracing

The primary coolant sampling lines pass from the containment to the auxiliary building via pipeways No. 1 and No. 4; hence, there is no need to provide heat tracing. The containment atmosphere sampling lines are as short as practicable and are insulated and provided with freeze protection having a minimum setpoint of 38°F. Since it is unlikely that the provision of additional heat tracing would entirely eliminate radioiodine plateout, we prefer using recirculation through the sample line as an attempt to approach equilibrium and thereby achieve a more representative sample.

5. Core Damage Procedure

As discussed by telecon with Mr. T. G. Colburn shortly after receipt of your December 22 letter, we planned to enjoin a uniform approach to this matter through the Westinghouse Owners Group. Subsequently, an ad hoc working subcommittee met in Pittsburgh on February 4, 1983 and determined that a sufficient uniformity of concerns existed to warrant further group efforts. An additional meeting is scheduled in Chicago on February 22 to develop further details of the group's position. Pending the results of this session, the group is likely to schedule a meeting with NRC on this matter. Wisconsin Electric plans to participate fully in this effort and, as discussed with Mr. Colburn, requests an indefinite extension for providing a revised core damage estimation procedure. A schedule will be submitted when the direction of the group's effort is fully defined.

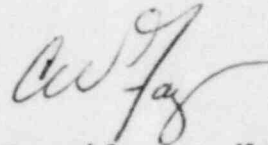
February 21, 1983

6. System Modifications Cancelled

In previous submittals we noted our intention to add a primary coolant post accident sampling system similar to that used by Connecticut Yankee. As a result of further analysis, we have determined the advantages of that system to be minimal and have cancelled our plans for the modification. Since the present system satisfies NRC requirements, no licensing action is required. However, the information is provided to clarify our intent. Note that the present system provides for the collection of an undiluted sample; dilution is accomplished in the laboratory facility.

If the staff requires any further discussion of these items, we would suggest a conference call be arranged by Mr. T. G. Colburn of your staff and Mr. C. W. Krause of our staff.

Very truly yours,



Vice President - Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector