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November 29, 1983

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

Attention: Mr. J. R. Miller, Chief
Operating Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AN. 50-301
REACTOR COOLANT SYSTEM
HIGH POINT GAS VENTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letters dated January 25 and May 9, 1983 the Nuclear Regulatory Commission approved exemptions from the schedular requirements of paragraph (c)(3)(iii) of 10 CFR 50.44 for Point Beach Nuclear Plant, Units 1 and 2, respectively. These exemptions allowed a delay in the final installation of the Reactor Coolant System (RCS) high point gas vents for Point Beach, Units 1 and 2, until January 1, 1984.

The piping and valving for the RCS gas vent system has been installed and hydrostatically tested in both Point Beach units. Using interim power supplies and an interim control panel, the RCS gas vent system may be remotely operated from the cable spreading room of the control building for both units, with the exception of the Unit 2 remote vent to containment. The valve for this vent path did not pass the leakage test; the valve was removed and the line was capped. The valve will be reworked or replaced during the next Unit 2 refueling outage scheduled for fall 1984. As further discussed in the exemptions, final completion of the RCS gas vent system is also dependent upon delivery, installation, and startup of the system control panels and the upgraded permanent power supplies.

As you know, subsequent to approval of these exemptions, we notified the NRC in a letter dated June 16, 1983 of delays in the delivery and installation of the Auxiliary Safety Instrumentation Panels (ASIP's). These panels will house much of the instrumentation,

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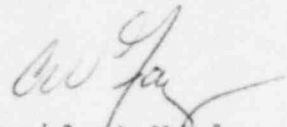
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controls, switching, and wiring for the NUREG-0737 backfit and upgrade modifications, including the permanent controls and wiring for the RCS gas vent system. The present status of the ASIP design and installation will be the subject of a separate letter; however, it is apparent that the ASIP will not be installed and operational before September 1, 1984. We also notified the NRC in a letter dated August 24, 1983 of anticipated delays in the implementation of upgraded emergency operating procedures (EOP's). Operation of the RCS gas vent system during accident conditions will be included as part of the EOP's. As described in our August 24 letter, the emergency operating procedures writing effort, verification and validation, operator training, and integration of the EOP's coincident with operation of the new instrumentation and systems cannot be completed until December 1984. Accordingly, we hereby request that the scheduler exemptions for the RCS gas vent system granted in your January 25 and May 9 letters be extended to reflect a revised completion date of December 1984 for the 10 CFR 50.44, paragraph (c)(3)(iii), RCS high point gas vents for Point Beach Nuclear Plant, Units 1 and 2.

We also wish to address concerns regarding the RCS gas vent system expressed in the NRC staff Safety Evaluation as provided with Mr. J. R. Miller's letter dated September 22, 1983. Specifically, both the Safety Evaluation and the NRC contractor's Technical Evaluation Report, which was forwarded by your letter dated October 12, 1983, specified that the licensee confirm satisfactory resolution of the common mode failure susceptibility of Target Rock solenoid operated valves. This issue was addressed by the RCS gas vent system vendor in November 1980. Three recommendations were made and adopted in the Point Beach RCS gas vent system initial design and installation to minimize the effects of the tendency of the containment vent solenoid valve to momentarily open in response to a step pressure transient. The conclusion of our investigation of this evaluation is that the valve design is suitable for the application and this valve motion in no way compromises the safety-related function of the vent system. You are welcome to inspect the detailed evaluation of this situation and its resolution, including the system modifications, during your post implementation review and audit of the RCS gas vent system.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector