



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

December 4, 1984

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 50-301  
ENVIRONMENTAL QUALIFICATION OF FEEDWATER  
REGULATING BYPASS VALVES  
POINT BEACH NUCLEAR PLANT, UNIT 2

On November 14, 1984 we submitted a letter to you discussing the environmental qualification upgrade program for the feedwater regulating bypass valves at Point Beach Nuclear Plant, Unit 2. On November 28, 1984 Mr. Tim Colburn of your staff and Mr. Roger Newton of my staff discussed the content of the letter and its request for a time extension for completing the upgrade program. This letter provides amplifying information concerning the time extension request.

The need for the environmental upgrade of 2-SV481, which causes the feedwater regulating bypass valve 2-CV481 to shut upon a safety injection system actuation or a high steam generator level condition, was identified in our letter to you dated May 20, 1983. In that letter a justification for continued operation was provided until the valve upgrade could be completed. That justification is still valid. The letter also requested that a time extension "until November 1, 1984 (i.e., the end of the next refueling outage for Unit 2)" be granted. Your letter dated July 22, 1983 granted this request based on the justification for continued operation provided.

During the November 28 telephone call, Mr. Colburn expressed concern about the timeliness of our November 14 request. A review of the circumstances leading to the apparent delay provides an explanation for the timing of our extension request.

During the early 1984 refueling outage at Point Beach Nuclear Plant Unit 1 the upgrade of these valves was performed. Pre-startup testing at that time showed that the closure time of the main feedwater regulating valves, while acceptable from a safety

8412120142 841204  
PDR ADOCK 05000301  
P PDR

A048  
1/0

analysis view, warranted improvement. Initially our design engineers believed one higher capacity solenoid valve could accomplish this and five solenoid valves were ordered on April 13, 1984 for the upgrade of Unit 2 (two valves for the main feedwater regulating valves, two for the bypass valves, and one spare). A review of the design showed that using two solenoid valves on each main feedwater regulating valve would be more appropriate, thus creating a need for six valves for Unit 2. Additional valves were ordered May 10, 1984. The supplier estimated a shipping date of September 19, 1984 for these valves.

A follow-up check on the shipment schedule resulted in the supplier changing the shipment date to the end of October. This was acceptable because the refueling outage, which we believed our time extension request was tied to, was then scheduled to end in mid-November. In a follow-up phone call towards the end of October, we were advised by the supplier of another delay until the end of November.

At this point my staff began considering alternatives for meeting the deadline. One option considered was to install only one qualified solenoid valve on the main feedwater regulating valve and put the other solenoid valve on the bypass valve. The second option was to leave the unqualified solenoid valve on the bypass valve and have a fast closure time on the main feedwater regulating valve. The second option was chosen based on the conclusion that the plant would be safer with the main feedwater regulating valve able to perform as designed at all times while at power instead of having a qualified valve in place on the bypass valve which is used very little in operation. After making and acting upon this decision, we prepared our November 14 letter to the NRC to inform you of the situation. We regret this represents some delay after the November 1 deadline date; however, we believed that sending you a complete description of our problems, including our solution for rectifying the situation and schedule for accomplishing this action, was also important. In the future, we will be more timely in completing such analyses and deliberations and in notifying you of the circumstances well before the expiration of such deadlines.

In summary, we believe that Wisconsin Electric Power Company has in good faith attempted to be timely and continued our strong effort of completing the environmental qualification effort at Point Beach. Safe operation is assured as explained by our original justification for continued operation. Additionally, the supplier has informed us that the valves were shipped to our facility on December 3.

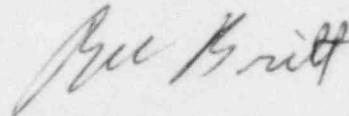
Mr. H. R. Denton

-3-

December 4, 1984

Should you have any additional questions regarding this matter, please contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "R. W. Britt".

President

R. W. Britt

Copy to NRC Resident Inspector

