



Wisconsin Electric POWER COMPANY
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May 2, 1985

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 AND 50-301
ENVIRONMENTAL QUALIFICATION OF PRESSURIZER
SAFETY VALVE DIRECT POSITION
INDICATORS AND INCORE THERMOCOUPLE CONNECTORS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This letter will inform you of the current status of the environmental qualification (EQ) programs for the Crosby lift indicating switch assemblies (LISA's) which have been installed on the pressurizer safety valves and for the Veam thermocouple (T/C) connectors which have been installed on the incore thermocouples at Point Beach Nuclear Plant, Units 1 and 2. This letter also requests an extension of the EQ deadline to August 31, 1985 for the LISA's and the thermocouple connectors pursuant to paragraph (g) of 10 CFR 50.49. The current EQ deadline for these two items had been established as June 7, 1985 in Mr. J. R. Miller's letter to Mr. C. W. Fay dated November 1, 1984.

A LISA test specimen using a Wisconsin Electric electrical interface design is currently undergoing loss-of-coolant-accident (LOCA) testing, the final phase of the EQ test sequence. We have experienced a test problem with the sealed flexible conduit interface installed on the LISA. Moisture entered the conduit and temporarily shorted out the electrical conductors. We believe that the test problem was due to improperly tightened fittings and a LOCA chamber overpressure of 132 psig versus the required 66 psig. Crosby is drying out the conduit, tightening the fittings, and rerunning the LOCA test to verify this hypothesis. In addition, testing had been halted by Crosby's Quality Assurance Manager to correct deficiencies in the LISA EQ test program recently identified by Wisconsin Electric's Quality Assurance personnel.

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Testing is expected to resume at the beginning of May and should be completed by the middle of June. The final test report then has to be prepared, reviewed, and approved by Crosby. In order for Wisconsin Electric to properly review the test report and prepare the associated plant-specific EQ documentation, we request an extension of the deadline to complete qualification of the LISA's until August 31, 1985. In the meantime, the LISA's have been installed in both Point Beach units so that when qualification is complete the LISA's can be put in service immediately.

The upgrade of the incore thermocouple system at Point Beach has been completed with the exception of environmentally qualifying the connectors used to interface the mineral-insulated cables at the reactor vessel head to the organically-insulated cables that carry the signals to the containment electrical penetration assemblies. As discussed in Mr. R. W. Britt's letter to you dated August 2, 1984, the connectors have satisfactorily completed seismic qualification. EQ testing has been proceeding, but the irradiation phase of the program encountered technical difficulties which have introduced a significant delay. Specifically, the radiation facility was unable to attain an adequate dose rate for several weeks. This problem has now been overcome and the samples are completing this phase of the test. LOCA testing is expected to commence in mid-May and should be complete in mid-June. Again, in order to allow time for the vendor to prepare a final test report and adequate review and documentation time for Wisconsin Electric, we request the deadline to complete qualification of the thermocouple connectors be extended to August 31, 1985.

We believe these requests are timely in that the problems have developed during testing in April. As soon as test schedules were established, which precluded meeting the current June 7, 1985 EQ deadline, we have informed you of the situation. We believe that these requests show good cause in that testing is progressing and the delay is due only to actual test complications.

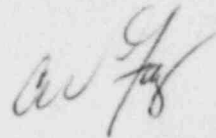
We believe the continued safe operation of Point Beach, Units 1 and 2, is justified without undue risk to the health and safety of the public. For the LISA's, this is based on the fact that the purpose of the LISA is to assist in identifying a small-break loss-of-coolant accident (SBLOCA) due to a stuck open relief valve. The Point Beach Emergency Operating Procedures do not require operator knowledge of a SBLOCA's location in order to mitigate its effect. Also, the LISA's provide no safety-related function, are not required to achieve or maintain safe shutdown, and are not necessary to mitigate design-basis accidents at Point Beach. Failure of the LISA's will not mislead the operator because they will not be placed in service until they are documented as qualified. In addition, an acoustical monitor system is available to the operators to verify safety valve operation.

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In the case of the thermocouple connectors, continued safe operation without undue risk to public health and safety is justified by the fact that adequate alternative indication of core outlet temperature is provided. The reactor coolant system hot leg loop resistance temperature detectors (RTD's), which are environmentally qualified, provide temperature indication to the operators, as well as input to the subcooling monitor. Hence, failure of the thermocouple connectors will not mislead the operator. The thermocouple system also provides no active safety-related function, is not required to achieve or maintain safe shutdown, and is not necessary to mitigate design-basis accidents at Point Beach.

We would be pleased to answer any questions you may have regarding this information or these requests for extension of the EQ deadline.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector

