



231 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201-2046

(414) 221-2345

August 20, 1996

10 CFR 50.4  
10 CFR 50.90

VPNPD-96-056

Document Control Desk  
US NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
SUPPLEMENTAL INFORMATION  
TECHNICAL SPECIFICATIONS CHANGE REQUEST 187  
ADOPTION OF 10 CFR 50, APPENDIX J, OPTION B  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated May 29, 1996, Wisconsin Electric Power Company, licensee for Point Beach Nuclear Plant (PBNP), Units 1 and 2, requested amendments to Facility Operating Licenses DPR-24 and DPR-27, respectively. The proposed amendments modified the PBNP Technical Specifications to incorporate the provisions of 10 CFR 50, Appendix J, "Primary Reactor Containment Leakage Testing for Water-Cooled Power Reactors," Option B. Option B endorses a performance based reactor containment leakage testing program.

The program proposed for implementation conforms to the guidelines of Regulatory Guide 1.163, "Performance Based Containment Leak Test Program," dated September 1995, allowing for one-time exception to the Type A test interval for PBNP, Unit 2. Regulatory Guide 1.163 would allow up to a 30-month test interval for containment Purge Supply and Exhaust Valves utilizing resilient seals.

The present test interval for these valves is governed by PBNP Technical Specification 15.4.4.II.C.1.e which requires leakage testing at 6 month intervals. The 6 month interval was adopted in response to issues related to valve seal degradation initially identified by the NRC in IE Circular 77-11, "Leakage Of Containment Isolation Valves With Resilient Seats." Amendments 64 and 69 to DPR-24 and DPR-27 incorporating the test interval into the Technical Specifications were issued on October 4, 1982.

In discussions with NRC staff concerning the revisions proposed in our Change Request 187, the staff indicated that approval of test intervals for the Purge Supply and Exhaust valves in excess of the present 6-month requirement, not to exceed the 30 months endorsed in Regulatory Guide 1.163, would require additional justification. The 6-month interval was based on generic reliability concerns during the late 1970s, not Appendix J requirements.

We have reviewed leakage test results and the maintenance history of these valves from 1992 to present in order to assess the reliability of the valves and support extension of the test interval to up to 30 months. Of the 36 leakage tests performed, nine per penetration, there have been no failures when compared to Technical Specification and Appendix J limits. In addition no valve has exceeded our administrative leakage limit of 2000 sccm.

The Purge Supply and Exhaust Valves are required by Technical Specifications to be locked closed when in other than cold or refueling shutdown. The valves are normally opened during refueling outages for venting of the containment. Refueling outages are presently conducted annually for each unit. Prior to closing the valves to establish containment

9608260108 960820  
PDR ADOCK 05000266  
PDR

1/0  
A017

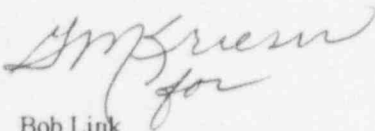
Document Control Desk  
August 20, 1996  
Page 2

integrity at the end of the outage, the valve seats are cleaned of dirt accumulated during system operation. Leak testing is performed following this cleaning. This practice will continue and be governed by our leak rate test program since the cleaning could affect the leak tight integrity of the valve.

Work orders on the valves were reviewed from 1992 present. No work orders were issued or work performed on the valves as a result of seat leakage or degrading seat leakage characteristics.

These reviews indicate the performance history of the valves will support extending the test surveillance interval to up to 30 months as allowed by the Regulatory Guide 1.163. Should you have any additional questions or require additional information, please contact us.

Sincerely,

A handwritten signature in cursive script, appearing to read "B. Link", with a stylized flourish underneath.

Bob Link  
Vice President  
Nuclear Power

TGM

cc: NRC Resident Inspector  
NRC Regional Administrator  
Public Service Commission of Wisconsin