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December 12, 1996

Mr. A. Bill Beach
Regional Administrator
Region III
U.S. NUCLEAR REGULATORY COMMISSION
801 Warrenville Rd.
Lisle, IL 60532-4351

Dear Mr. Beach:

DOCKET 50-301
IDENTIFICATION OF ACTIONS REQUIRED FOR RESTART
POINT BEACH NUCLEAR PLANT, UNIT 2

On December 5, 1996, Wisconsin Electric Power Company personnel met with you and members of your staff to discuss the extent and status of corrective actions for the apparent violations discussed at the enforcement conference on September 12, 1996. The violations were subsequently characterized and a Notice of Violation issued on December 3, 1996. In our discussions on December 5, we were requested to provide a list of issues which we believe will require resolution prior to the restart of Point Beach Nuclear Plant, Unit 2 from its present refueling outage.

Attached, is a listing of those issues for resolution and other actions to be taken prior to the restart of Unit 2. We have attempted to ensure each item is clearly identified and defined. We will routinely update you and your staff as to our progress and any necessary changes to this list.

We continue to work on finalizing and implementing an overall plan for achieving operational excellence. The restart issues as defined in the attachment are a subset of this broader plan. We would like the opportunity to discuss our plan for achieving operational excellence in greater detail in the near future.

If you or your staff have any questions concerning these items, please contact us.

Sincerely,

Attachment

cc: NRC Document Control Desk
NRC Resident Inspector
NRC Project Manager

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PRIORITY ROUTING			
First		Second	
✓ RA	<i>has</i>	RC	
✓ DRA	<i>has</i>	EIC	<i>has</i>
✓ DRP		SGA	
✓ DRS	<i>has</i>	OI	
DWMS		PAO	
DRMA			
FILE		<i>has</i>	

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POINT BEACH NUCLEAR PLANT UNIT 2 STARTUP COMMITMENT LIST

IDENTIFICATION AND RESOLUTION OF ISSUES PERTINENT TO REACTOR SAFETY

The following actions will be taken prior to Unit 2 criticality, except as specifically noted. The scope of reviews will be examining the identified documents or items for accuracy and compliance with requirements. Should any reviews identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of those reviews will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Commitment ID Number	Description
1	Complete a detailed Unit 2 Containment Materiel Condition Assessment, addressing housekeeping, system walkdowns, materiel condition, and instrumentation. Extensive work inside Containment was conducted this outage due to the Steam Generator replacement project.
2	Walkdown all accessible Unit 2 and common Maintenance Rule systems for adequate visual material condition.
3	Walkdown all accessible Unit 2 and common systems for outstanding work order tags.
4	Conduct as-built inspections of the electrical and I&C components on the Unit 2 CVCS and CCW systems (Work Orders 9607322, 9611140, 9606548, and 9611139).
5	Complete Work Orders 9513222 through 9513225 to conduct inspections of Appendix R alternate power transfer switches.
6	Complete Work Order 9604151 to perform foreign material exclusion inspections on the Unit 2 4160V safeguards bus 2A-06 and breakers.
7	Complete a review of Unit 2 administrative controls implementing or referencing Technical Specifications to ensure Technical Specification requirements are appropriately reflected in the administrative controls.
8	Review 20% of the Operations Technical Specification, Inservice Test, and Operations Refueling Test related surveillance procedures, with concentration on those involving major equipment. Upgrade as necessary to include appropriate initial conditions, return to service lineups, properly specified independent verification, reviewing acceptance criteria, and Technical Specification implementation.
9	Review the In Service Testing (IST) acceptance criteria for the remaining IST pumps to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Make any changes necessary as a result of this review.
10	Review the In Service Testing acceptance criteria for all IST valves to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Complete necessary operability evaluations, revise procedures, and resolve Unit 2 equipment discrepancies.
	Complete the following regarding installed instrumentation used in the IST program:

11	<ul style="list-style-type: none"> • Identify the Unit 2 installed instruments used in the IST program. • Review the performance of the identified instruments over the last 3 years. • Review the suitability of the instrumentation for use in the IST program. • Review all IST pump hydraulic data over the past year for adverse trends. <p>As necessary, make changes as a result of these actions.</p>
12	Review 20% of the surveillance procedures associated with safety significant non-pump and valve components (such as heat exchangers and fans) to ensure that the surveillance acceptance criteria satisfy the requirements of the plant design basis/accident analysis. Make changes as necessary as a result of this review.
13	Review other operating procedures that contain maintenance activities and revise as necessary to ensure PMT and QC are properly addressed by those procedures.
14	Review equipment return to service testing requirements prior to the following U2R22 mode change readiness reviews to ensure the required equipment is operable prior to changing modes: core reload, leaving cold shutdown, and the approach to criticality.
15	Review 20% of the maintenance work orders performed since January 1, 1995 on Unit 2 or common PSA safety significant systems (AFW, SW, EDG, IA, 4.16 kv, gas turbine, and CCW) to verify adequate PMT was performed to ensure system/component safety function.
16	Complete all Unit 2 Maintenance Rule related work order post-PMT reviews prior to the approach to criticality.
17	Review 50.59 screenings conducted in 1996. Upgrade those determined to require a 50.59 evaluation.
18	Review outstanding JCOs. Perform operability determinations and 50.59 evaluations needed to address the issues.
19	Conduct a review of 50.59 evaluations from this outage. Ensure all conditions of the evaluations have been completed.
20	Review items from existing open item lists (e.g., NUTRK) to identify potentially degraded equipment.
21	Review open items from the Design Basis Document development program.
22	All open operability evaluations for Unit 2 and common equipment will be reviewed for acceptable closure of the degraded equipment issue. Disposition outstanding issues in accordance with 10CFR50.59 and Generic Letter 91-18.
23	Review 20% of the Condition Reports closed since January 1, 1995 which are associated with PSA safety significant systems for degraded equipment operability issues to ensure that we have adequately identified and dispositioned operability issues.
24	Complete an additional Outage Safety Review for the startup phase of the outage.
25	Conduct an integrated review of all outage licensing commitments (50.59's, enforcement conference items, Technical Specification Change Requests, and Reload Safety Analysis). Ensure all requirements are met.
26	Revise ORT-3 and DCS 3.1.11 to ensure Technical Specification 15.4.6.A.2 testing includes dynamic loading of the EDG with sequenced loads.
27	Test all EDGs in accordance with revised ORT-3 and DCS-3.1.11. Return the electrical systems to normal alignment prior to leaving cold shutdown.

28	<p>Resolve the containment penetration commitments, including:</p> <ul style="list-style-type: none"> • CP-32 (Containment penetration for Auxiliary Charging line). • Penetration thermal relief issue.
29	Complete a 50.59 evaluation for the existing CCW supply to the RCP seals as a safety function.
30	Update the diesel generator loading calculation N-91-016 to properly reflect the loading of the Containment Fan Coolers.
31	Evaluate the adequacy of coordination on the 120 VAC instrument bus system through a 50.59 or operability review.
32	Implement interim improvements for the Condition Reporting process, based on a review of assessments and identified recommendations for improving that process.
33	Implement interim improvements for the 50.59 process to require that all screenings be either authored or reviewed by a member of the multi-disciplinary review team.
34	Upgrade Unit 2 operations checklists to include requirements for initials, time, and date. During the review, verify that the checklists are technically correct.
35	Revise applicable IST program documents to prevent equipment from being returned to service (declared operable) with vibrations in the alert range.
36	Revise NP 8.1.1, Work Order Processing, and NP 8.1.3, Post-Maintenance Testing to ensure post-maintenance testing , operability testing, and surveillance test requirements are properly addressed.
37	Include return to service testing in the plant schedule, both outage and nonoutage.

COMPLETE PHYSICAL WORK WHICH SUPPORTS SAFE STARTUP AND POWER OPERATIONS

Modifications which Point Beach Nuclear Plant has identified as being significant to safety and scheduled for completion in U2R22 will be in an accepted status (i.e., the applicable physical work completed, post-maintenance testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications. These modifications are:

Commitment ID Number	Description
38	Modification 96-033 - replace control power transformers on Motor Control Centers 2B32 and 2B42.
39	Modification 90-048 - replace Boric Acid and Reactor Makeup Water totalizers, replace the CVCS control switch, replace flow indicators, and refurbish flow controllers. This resolves an Operator workaround issue.
40	Modification 94-097 - remove six RCS loop drain valves.
41	Modification 92-141 - relocate the RHR flow control valve controllers on 2CO3 for human factoring.
42	Modification 96-073 - seismically upgrade CCW, SI, RHR, and RHT letdown piping supports and remove an AFW snubber.
43	Modification 94-066 - install a soft seat in containment isolation valve 2SI-834D, and add a relief valve and pressure regulator in the nitrogen supply line to the SI accumulators. This resolves an Operator workaround issue.
44	Modification 96-065B - seismically upgrade the Refueling Water Storage Tank recirculation line.
45	Modification 96-054 - install pressure gauges in the service water return header from the Emergency Diesel Generator GO1 and GO2 glycol coolers, and reset the throttle valves in that line.
46	Modification 96-022 - install a new 125 VDC feed to 480V safeguards bus 2B03.
47	Modification 94-055 - add seismic supports to the raceway between risers 56 and 62 on C04 (Reactor and Primary Plant Control Board).
48	Modification 96-068B - eliminate containment heating steam and condensate return containment isolation valves.
49	Modification 96-053 - replace an elbow in the west service water header.
50	Modification 95-070 - seismically upgrade the containment cooling fans and filters.
51	Modification 96-026 - install, delete, and modify supports for feedwater, main steam, and SI system piping for the 79-14 project.
52	Modification 96-058 - move Power Plant Computer System alarms to the exterior of C-20 panels.
53	Modification 94-095 - replace 8 Main Steam Condenser steam dump valves with improved design.
54	Modification 95-029 - replace SI accumulator level transmitters.
55	Modification 95-035 - modify Containment Spray additive tank controller circuit.
56	Modification 96-063 - replace 345 KV breakers (3-4, 4-5, and 142).

57	Modification 96-069 - replace four breakers (1Y-06-01, 1Y-06-03, 1Y-06-05, and 1Y-06-11) associated with instrument bus 1Y-06.
58	Modification 95-058*O - repair Steam Generator intermediate leg supports. This may be resolved through analysis.
59	Modification 96-070 - replace molded case circuit breakers associated with instrument buses 2Y-05 and 2Y-06.

The work and testing associated with these Work Orders will be completed prior to the associated component/system being declared operable. Emergent Work Orders associated with Maintenance Rule Risk Significant Systems which Point Beach Nuclear Plant defines as priority level 1 to 4 will be completed prior to Unit 2 criticality.

Commitment ID Number	Description
60	Work Orders 9601506, 9602502, 9603921, 9611267, 9611278, and 9611755 - replace proximity switches and targets with an improved design and overhaul the Fuel Transfer Cart to enhance control system operation. This resolves an Operator workaround issue.
61	Work Orders 9613568 and 9613569 - provide bonnet pressure locking relief for the SI-857A and SI-857B valves (interface valves between RHR and High Head SI) on Unit 2.
62	Work Order 9611757 - correct the leakage which leads to boric acid buildup in the cylinder blocks of "B" Charging Pump.
63	Work Order 9603532 - repair the handswitch for 2P-2A, the "A" Charging Pump.
64	Work Orders 9611624 through 9611626 - replace existing pneumatic turbine generator circuitry time delay relays with plug-in, electronic time delay relays.
65	Work Order 9606626 - reinstall switches on the Unit 2 Containment hatch third door to allow monitoring of door status.
66	Work Order 9611052 - replace the 2P-10B switch, the "B" RHR Pump control switch.
67	Work Orders 9611198 and 9611199 - repair the body-to-bonnet boric acid leak on CV-307 B (lowside tap for "B" RCP #1 seal d/p) and CV-308B (lap seal d/p for "B" RCP).

The following actions will be completed to correct Operator workarounds prior to Unit 2 criticality, except as specifically noted:

Commitment ID Number	Description
68	Repair valve AR-3511 per Work Order 95-13340. The Unit 2 priming air ejector is blank flanged due to air in-leakage through the condenser air removal isolation valve, AR-3511.
69	Repair the drain valve for the heating steam moisture separator per Work Order 96-13451. The Unit 2 heating steam moisture separator level has been difficult to maintain during normal operations, and frequent alarms were received due to low level. This will be tested following Unit 2 startup.
70	Install a new level control system for the brine tank (T-118) per Modification 92-008*Q. The tank overflows because the installed automatic level control system is not effective, and there is no high level alarm for the tank.
71	Repair MS-249, the Unit 2 steam line sample valve, per Work Order 96-03128. The valve had a packing leak which required steam header sampling to be shifted to the B steam header.
72	Repair alarm switch 2LS-2511 per Work Order 96-05711. The Unit 2 D MSR level was being maintained low in the band due to level oscillations and a steam leak from the alarm switch.
73	Repair 2P116, the Unit 2 Boric Acid Recirculation Pump, per Work Order 96-03130. It has a significant seal leak.

PERSONNEL AND LICENSING READINESS

The following actions will be completed prior to Unit 2 criticality:

Commitment ID Number	Description
74	Each operating crew will receive simulator training to gain proficiency in casualty response, the expected response of the newly installed steam generators and reactor core, and placing the turbine on-line.
75	Revise the initial and requalification operator training plans to include a review of the administrative procedures identified as significant to daily operation of the plant during each two year operations training plan.
76	Conduct roundtable discussions with all MSS\SS\DTA personnel regarding conservative decisionmaking, Technical Specification interpretations, and lessons learned from recent regulatory communications and perspectives. Review outlier Technical Specification interpretations for interim applications.
77	Complete the procedure changes and training associated with the new Technical Specification on ECCS regarding the new Containment Integrity Analysis.
78	Communicate specific expectations regarding AFW and EDG status control to Operators.
79	Restore a proceduralized capability to operate the Containment Spray Pumps in the recirculation mode of the ECCS.
80	Obtain amendments requested by Change Requests 188 and 189 related to Steam Generator replacement; 192 related to Secondary Water operability; and 194 related to Low Temperature Overpressurization limits. This will include resolution of issues related to Control Room and offsite dose evaluations for the analyzed events.
81	<p>Submit the following requests for license amendments resulting from the review of existing Technical Specification interpretations:</p> <ul style="list-style-type: none"> • Revise the maximum acceptable power level when crossover steam dumps are inoperable (TS 15.3.4.E). • Revise requirements for offsite power lines availability to address adequacy (TS 15.3.7.A.1.a). • Remove allowances in TS 15.3.1.A.1.a for single reactor coolant pump operation. • Appropriately modify the minimum required boron concentration in the Refueling Water Storage Tanks.