



**Wisconsin Electric** POWER COMPANY

231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

August 26, 1985

VPNPD-85-277

NRC-85-90

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

Attention: Mr. Edward Butcher, Acting Chief  
Operator Reactor Branch No. 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
INSERVICE TESTING PROGRAMS FOR PUMPS AND VALVES  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated March 28, 1985, Wisconsin Electric (WE) submitted a revised inservice test (IST) program for review and an additional relief request for review and approval. Furthermore, due to manpower constraints associated with the Unit 1 refueling outage and the need to modify the Point Beach Nuclear Plant (PBNP) IST program to accommodate the interim relief granted, a request to delay implementation of the IST program until August 1, 1985 was made.

In a letter dated June 11, 1985 you granted WE permission to delay implementation of the PBNP IST program until August 1, 1985. We were directed to implement the proposed IST program submitted on March 28, 1985, with the exception of pump relief request No. 9, concerning pump vibration measurements. As directed in your letter, we must also comply with the existing Technical Specifications when more restrictive than the proposed IST program.

On August 1, 1985, WE implemented the IST program as directed in your June 11, 1985 letter. Essentially, all facets of the program have been implemented except where existing Technical Specification testing requirements are more restrictive. Full implementation of the program cannot be accomplished until the pending Technical Specification changes have been approved and the following two tasks are completed. We are developing a cold shutdown test to verify that the main feedwater check valves go from open to shut upon cessation or reversal of flow, and we must review all instrumentation used in pump testing to ensure these instruments meet the range and accuracy requirements of Article IWP-4100 of ASME Section XI. Our schedule for completing these tasks is discussed below.

8509030174 850826  
PDR ADOCK 05000266  
P PDR

-1-

A047  
11

August 26, 1985

During the upcoming fall 1985 Unit 2 refueling outage, we are scheduling testing to determine what methods are feasible and acceptable to verify that the main feedwater check valves will shut upon cessation or reversal of flow. Although there are several methods to verify this action, including installation of valve position indicators or measurement of back leakage, we cannot be sure which method is most appropriate until after this testing is accomplished. It is possible that following this testing plant modifications may have to be made and/or additional IST reliefs requested to satisfy this testing requirement. Our review of pump testing instrumentation for compliance with Article IWP-4100 of ASME Section XI will also be continued.

If plant modification or additional relief requests are necessary to test the main feedwater check valves or to meet the instrumentation requirements of ASME Section XI, we will notify you by June 30, 1986. A schedule to complete any necessary modifications to support the IST program would also be provided to you at that time.

Enclosed is a revision to the Unit 1 and 2 Point Beach IST programs for your review. These program revisions replace in their entirety the previous submittals for pump and valve testing for both units. This revision is submitted to correct several errors in the valve tables and to add some information concerning fail safe testing of valves. A summary of the changes made is also provided. As previously directed, pump relief request No. 9 will not be used until NRC staff approval is granted.

As you know, Wisconsin Electric filed License Amendment Request Nos. 42 and 58 on February 17, 1977 and November 27, 1978 for Point Beach Nuclear Plant, Units 1 and 2 respectively, for Technical Specification changes necessitated by the revised inservice testing requirements, as required by 10 CFR 50.55a. To date, only certain portions of these proposed amendments have been reviewed and approved by the NRC.

Technical Specification changes stand in agreement with these revised programs and should be expedited. As we have previously stated, it is our position that approval of these outstanding Technical Specification change requests should have been completed prior to implementation of the new IST programs. However, pursuant to your order transmitted by letter dated June 11, 1985, the subject inservice testing programs were implemented in conjunction with the existing Technical Specification testing requirements. We nonetheless request your prompt approval of these long outstanding license amendment requests.

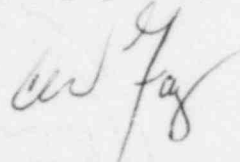
Mr. H. R. Denton

-3-

August 26, 1985

Should you have any questions regarding the attached programs or require additional clarification or details, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "C. W. Fay". The signature is written in a cursive style with a large, stylized "F" and "Y".

Vice President-Nuclear Power

C. W. Fay

Enclosures

Copy to NRC Resident Inspector

CHANGES TO IST PROGRAM  
UNIT 1 & 2

<u>Section</u>	<u>Changes</u>
Table of Contents	Add Section 2.6, "Fail Safe Testing of Valves."  Add Appendix "C," "Fail Safe Testing of Valves."
Section 2.6	Add Subsection 2.6 describing the methods to perform fail safe testing of valves at PBNP.
Section 2.7	Correct date on the Fay to Denton letter from 02-24-84 to 02-29-84.
Section 2.0 Explanation of Abbreviations	Added vacuum breaker to the List of Abbreviations.
Valve Tables:	
Unit 1 Page 14a	Deleted exercise test of RC-595. This is a manual valve. No test is required.
Unit 1 Page 28	Deleted exercise test of SA-14. This is a manual valve. No test is required.
Unit 1 Page 41	Deleted exercise test of DI-9 and DI-11. These are manual valves. No test is required.
Unit 2 Page 14a	Delete exercise test of RC-595. This is a manual valve. No test is required.
Unit 2 Page 24	Delete exercise test of SA-15. This is a manual valve. No test is required.
Unit 2 Page 31	Deleted exercise test of DI-9 & DI-11. These are manual valves. No test is required.
Appendix "C"	Add new appendix to describe the requirements of fail safe testing of valves at PBNP.