



**Wisconsin Electric** POWER COMPANY

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VPNPD-85-537

NRC-85-126

November 27, 1985

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  
Operating Reactors, Branch No. 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
CONFIRMATION OF SCHEDULE FOR  
REGULATORY GUIDE 1.97 COMMITMENTS  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Our September 1, 1983 letter to you responded to Supplement 1 to NUREG-0737 regarding our plans to meet the requirements of Regulatory Guide 1.97. This letter identified a number of instrumentation upgrades at Point Beach to which we had committed to meet the intent of the Regulatory Guide. On July 2, 1984 the Commission issued an Order confirming the commitments made by Wisconsin Electric to implement those post-TMI-related items set forth in Supplement 1 to NUREG-0737, "Requirements for Emergency Response Capability", (Generic Letter 82-33). The Order required the implementation of Regulatory Guide 1.97 items by December 31, 1985. We believe that this Order applies only to the instrumentation upgrades previously identified and committed to in the September 1 letter.

The purpose of this letter is to confirm the schedule for implementation of two additional instrument upgrades recently committed to in an August 30, 1985 letter (NRC-85-93) from C. W. Fay to H. R. Denton. The August 30 letter responded to your interim report regarding implementation of Regulatory Guide 1.97 at Point Beach. These additional upgrades relate to neutron flux monitoring and pressurizer relief tank temperature monitoring.

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Mr. H. R. Denton  
November 27, 1985  
Page 2

In the August 30 letter, it was stated that Wisconsin Electric now intends to install one additional channel of neutron flux monitoring per unit. The channel will consist of a neutron fission chamber system capable of monitoring the entire range from approximately  $1.0E-7$  to 100 percent rated reactor power, and will be seismically and environmentally qualified. The new channel will be installed in a qualified configuration during the 1987 refueling outages for each unit. This schedule will allow sufficient time to specify, procure, and install the required equipment (which will include a new containment electrical penetration assembly).

As described in Item 6 of the enclosure to the August 30 letter, Wisconsin Electric intends to change the range of the pressurizer relief tank temperature monitors at Point Beach from 0-300°F to 50-350°F. This new range complies with the recommendations of Regulatory Guide 1.97. We are also planning to complete this modification during the scheduled 1987 refueling outages for each unit, which again allows sufficient lead time to specify, procure, and install the required components.

We believe that the two additional instrument upgrades described above will adequately meet the intent of Regulatory Guide 1.97, and that the schedule presented is a reasonable time frame in which to implement them. We, therefore, confirm our intention to complete the neutron flux monitoring and pressurizer relief tank temperature monitoring upgrades by December 31, 1987.

This letter will also confirm additional information regarding condenser effluent radioactivity monitoring and pressurizer heater status as requested by Mr. T. G. Colburn of your staff.

With regard to the effluent radioactivity monitors for noble gas effluents from the condenser air ejector system exhaust, the Radiological Effluent Technical Specifications (RETS) were implemented at Point Beach on October 10, 1985. The RETS require gaseous effluent monitors to be calibrated in accordance with the Point Beach Nuclear Plant Off-Site Dose Calculation Manual (ODCM), which specifies calibration reference to Xe-133 equivalents. Therefore, our gaseous effluent monitor calibration factors and calculated operating ranges are now expressed in terms of Xe-133 equivalents, as permitted by Regulatory Guide 1.97.

The resultant calculated operating ranges expressed in Xe-133 equivalents are as follows:

<u>Detector Channel</u>	<u>Range (<math>\mu\text{Ci/cc-Xe-133 Equiv.}</math>)</u>		<u>Detector Location</u>
	<u>Lower Limit</u>	<u>Upper Limit</u>	
1-RE215	8.2E-7	2.9E-2	Unit 1 Air Ejector
2-RE215	6.8E-6	1.4E-1	Unit 2 Air Ejector
RE225	1.2E-6	1.2E-2	Common Delay Duct

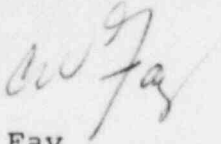
The recommended range identified in Regulatory Guide 1.97 is 1.0E-6 to 1.0E-2  $\mu\text{Ci/cc}$ . The Unit 1 monitor covers the entire instrument range, while Unit 2 meets the upper limit and is close to the lower limit. The inability to achieve a smaller lower limit of detection on the Unit 2 monitor may have been due to elevated background readings at the time of calibration. The third monitor listed, RE225, is located in the combined air ejector delay duct through which both units air ejector exhaust gases are released. This monitor essentially covers the entire recommended instrument range. The monitors were calibrated using a radioactive gas sample from the gas decay tanks. The gas sample radionuclide concentration was quantified using a multi-channel analyzer and a Geli detector. Monitor detector and channel calibration is accomplished by inserting the detector into a simulated piping configuration with similar geometries to the air ejector ducts and exposing the detector to the calibration gas. The monitor calibration and accuracy associated measuring is estimated to be approximately  $\pm 20\%$ , which is within the accuracy prescribed by Regulatory Guide 1.97. Therefore, we believe that these instruments meet the intent of Regulatory Guide 1.97 regarding instrument range.

Finally, with regard to pressurizer heater status, the 480V buses (2 safeguard and 2 non-safeguard), which supply the five pressurizer heater groups, have ammeters on the main electrical system control panel in the control room for the 4160V/480V supply transformers. These ammeters have a range of 0-200 amps on the non-safeguard and 0-400 amps on the safeguard transformers. Each heater group load of 200 kw is approximately 25 amps (4160 volt side), and can be readily seen on the associated ammeter during cycling to verify operability. Thus, these indications, in addition to those outlined in the August 30 letter, are judged adequate to meet the intent of Regulatory Guide 1.97 regarding pressurizer heater status.

Mr. H. R. Denton  
November 27, 1985  
Page 4

We trust that the above information will allow you to complete your final safety evaluation report regarding our compliance with Regulatory Guide 1.97 at Point Beach. If you have any questions regarding these matters, please contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "C. W. Fay", is written over the typed name.

C. W. Fay  
Vice President  
Nuclear Power

Copy to NRC Resident Inspector