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VPNPD-90-015  
NRC-90-001

January 8, 1990

U. S. NUCLEAR REGULATORY COMMISSION  
Document Control Desk  
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Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
STATUS OF IR 50-266/89012 50-301/89011  
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

Inspection report IR 50-266/89012 50-301/89-011 was received on June 6, 1989. The subject of the inspection was the status of Point Beach Nuclear Plant responses to concerns raised during the Emergency Diesel Generator vertical slice SSFI conducted by Wisconsin Electric. On October 2, 1989, a visit was made to Wisconsin Electric Corporate offices in Milwaukee by Region III personnel to assess the progress on our responses. On October 13, 1989, a meeting was held between Wisconsin Electric personnel and Region III management personnel to discuss the specifics of the SSFI conducted at Wisconsin Electric request by WESTEC on the Emergency Diesel Generator systems and the vertical slice audit performed on the Residual Heat Removal System by Wisconsin Electric personnel using the WESTEC format as a guide. The following discussion updates the progress made on issues brought up during the above inspection and during the various meetings held between Wisconsin Electric and Region III.

Each of the references in this discussion are based upon the numbering system used in the original inspection report.

Item 4.a: The inspector's observation that the new calculation for the as-built configuration of piping change to the fuel oil transfer pump bypass line was completed is correct. The history of events is as follows:

1. The original design was generated in late 1983 and was supported by a calculation attached to the modification request with a cover sheet.

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2. The design was revised in accordance with review and approval comments. The revised design was supported by approved calculations. These were based upon the original design's calculations.
3. The revised design was installed with field changes based upon verbal concurrence of the responsible design engineer.
4. The modification package does not document the acceptability of the as-built configuration. The as-built change involved a reduction in the cantilever of the bypass loops.

By July 1990 a revised calculation will be performed to reflect the as-built configuration. We believe recent revisions to QP 3-1, "Modification Requests" will be adequate to prevent modifications from being completed without the appropriate documentation for the as-built condition.

Item 4.b: This paragraph notes the inspector's position on our resolution of the need to perform 10 CFR 50.59 safety evaluations for five issues reviewed during the WESTEC SSFI. There was a disagreement with one issue involving the number of cells in the station batteries and a second which related to MR 82-51. The first issue, designated as PT.R-5, involved the decision to change the station batteries from 60 cells to 59 cells. This decision was made and completed prior to the issuance of the operating licenses for either Units 1 or 2. Our resolution of this issue is to change the FSAR to reflect the as-built configuration of the PBNP station batteries with 59 cells and 103.25 volts. This will be submitted with the next FSAR revision in July 1990.

The resolution for MR 82-51 is discussed in the next section.

Item 4.c: MR 82-51 relocated a section of the buried fuel oil transfer line from the emergency fuel oil storage tank to the emergency diesel generator (EDG) day tanks to accommodate the south gate security building expansion. The line had originally been moved south for the construction of the Technical Support Center as modification M-704. A relatively short safety evaluation for M-704 was completed. A safety evaluation was not attached to the MR 82-51 package although a three line summary of a safety evaluation was included in the Manager's Supervisory Staff meeting minutes. MR 82-51 was performed on August 20, 1982. Neither of these safety evaluations (M-704 or MR 82-51) fully meets the licensee's review requirements applicable in 1988.

The original basis for the decision of not applying 10 CFR 50.59 to the pipe relocation was that the line was not safety related and that the line changes did not affect the safety analysis as outlined in the FSAR.

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This modification package was identified by the WESTEC SSFI as one that probably required a safety evaluation in accordance with 10 CFR 50.59. In 1988 we reevaluated the need to perform a 10 CFR 50.59 evaluation of the modification. At that time, 10 CFR 50.59 was interpreted to apply to changes that affected FSAR descriptions and regulatory commitments (licensing basis).

The reroute of the fuel oil line was determined to not require a 10 CFR 50.59 safety evaluation since the pipe rerouting did not affect the existing licensing basis. The licensing basis acknowledged the existence of the line, that it was buried and that it was seismically qualified.

To address the specific Modification Request, a contractor was retained to perform a detailed seismic analysis of the section of line affected by the subject modification. The results were satisfactory. In addition, a 10 CFR 50.59 evaluation was performed for MR 82-51 to ensure that there is not an unreviewed safety question. This evaluation has been reviewed and accepted.

NUMARC has issued a guideline (NSAC 125) for 10 CFR 50.59 evaluations. We are currently reviewing QP 3-3, our procedure for conducting 10 CFR 50.59 evaluations, to reflect NSAC 125 guidance. The revision to QP 3-3 is expected to be approved in May, 1990.

Item 4.d: The inspector expressed some concern about the lack of response to the WESTEC review of 241 of the 1987 modification requests. We had contracted with WESTEC to critique all 1987 modification requests for 10 CFR 50.59 applicability and evaluate the content when a safety review was performed. The intent of this evaluation was to compare our application of 10 CFR 50.59 to that of industry practice, recent NRC interpretations and the initial draft of the NUMARC guidance. WESTEC identified 87 modification requests which had initially been identified as not requiring a 10 CFR 50.59 evaluation which they believed could require the evaluation.

After the screening by WESTEC, a meeting was held between WESTEC personnel, a representative of our Quality Assurance Section and the Modification Engineer to discuss the applicability of 10 CFR 50.59 to each of these 87 modification requests. Each of the modification requests was reviewed based upon the work as designed and the work as actually done. Upon completion of the review, questions were resolved for each of the modification requests. None of the 87 modification requests identified violated PBNP procedures or the interpretation of 10 CFR 50.59 that existed at the time of the generation of the modification requests; and no need was identified for a 10 CFR 50.59 backfit on any of these requests.



Although in paragraph 4.d the inspector did not comment on those 10 CFR 50.59 reviews that were done, please note that WESTEC also reviewed those 10 CFR 50.59 reviews that were completed for the 1987 modification requests. The scope of 19 out of the 90 reviewed was questioned. After further discussion with the modification engineer or the responsible engineer all but five of the 19 concerns were resolved. It was clear that the final five were not resolved because of a basic difference in the philosophy of using a 10 CFR 50.59 evaluation to establish design criteria versus using the evaluation to ensure that a change in the licensing basis does not pose an unreviewed safety question. The latter interpretation encompasses the Point Beach philosophy. In any case, each of the five modification requests did have an additional 10 CFR 50.59 review completed.

It must be noted that although no reason was found to backfit 10 CFR 50.59 evaluations to those modifications that did not have and did not need them under the criteria in use at the time of the modification, several of the modifications reviewed could be considered in the "gray" area as to requiring a 10 CFR 50.59 evaluation. As a conservative measure these modifications did have evaluations backfitted into the modification packages.

Item 4.e: The following programmatic changes were made as a result of the above observations.

- a. PBNP adopted the basic NUMARC applicability and evaluation philosophies.
- b. The basis for "no 10 CFR 50.59 required" will now be required to be documented.
- c. The 10 CFR 50.59 evaluation will now be performed on the modification's final design rather than in the initial/conceptual stages.

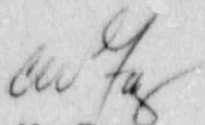
The inspector noted that no evidence of plans to look at pre-1987 modifications was apparent. Wisconsin Electric does not believe that a review of all pre-1987 modifications is necessary. We do intend to review selected pre-1987 modifications as part of our design basis reconstitution project. The project schedule and selection of systems for design basis reconstitution will address the importance of the system to safe operation. The review will evaluate the pre-1987 modifications related to each system and determine the impact of each modification on the system design basis. When we have finalized the sequence of systems to be reconstituted, we will also consider a more immediate review of the pre-1987 modification requests of those systems that are scheduled late in the design basis reconstitution effort.

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Wisconsin Electric believes this discussion should answer those issues raised in the referenced inspection report.

If you have any comments on or questions about these issues please contact us.

Very truly yours,



C. W. Fay  
Vice President  
Nuclear Power

Enclosure

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector

