



Wisconsin Electric POWER COMPANY

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July 31, 1981

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

Attention: Mr. D. G. Eisenhut, Director
Division of Licensing

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
RESPONSE TO GENERIC LETTER 81-01
QUALIFICATION OF INSPECTION, EXAMINATION AND TESTING,
AND AUDIT PERSONNEL
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Generic Letter 81-01 pertaining to qualification of inspection, examination and testing, and audit personnel requires that the intent of Regulatory Guides 1.58 and 1.146, which endorse ANSI Standards N45.2.6 and N45.2.23, respectively, be implemented by all operating nuclear plants. Wisconsin Electric has established a Quality Assurance Program applicable to Point Beach Nuclear Plant, which has previously been accepted by the NRC Staff, that we believe responds to these areas of interest.

A combination of audits is conducted for Point Beach as part of the Quality Assurance Program. Various groups associated with the plant, including the Off-Site Review Committee (off site), the Quality Assurance Division (off site), and the Engineering, Quality, and Regulatory Group (on site), conduct reviews or audits of the Quality Assurance Program. The reviews conducted by the Off-Site Review Committee and the audits by the Engineering, Quality, and Regulatory Group are generally of a technical nature and in our experience and judgment need to be performed by technically competent people. The Off-Site Review Committee conducts semiannual meetings at which time plant operations relating to Technical Specification requirements are examined and discussed. The Engineering, Quality, and Regulatory Group monitors activities such as maintenance and modifications on a continuous basis with monthly formal reviews. Point Beach strongly endorses the concept of utilizing technically qualified personnel for conducting these reviews and audits.



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The Quality Assurance Division, however, performs quality assurance audits of plant and contractor activities, and accordingly, personnel are trained and experienced in auditing techniques. All Quality Assurance Division audits of in-plant activities are presently performed by personnel certified as lead auditors per ANSI N45.2.23 and this practice will continue in the future. Additionally, Quality Assurance Division auditing activities are supervised and monitored by personnel certified as lead auditors per ANSI N45.2.23.

The majority of inspections at Point Beach are performed by the worker's first-line supervisor; however, final quality assurance acceptance is performed by someone other than the first-line supervisor or anyone reporting to him. All personnel at Point Beach are evaluated to meet minimum qualification requirements. These evaluations consider such areas as regulatory, code, and standard requirements, as well as education, training, and work experience. Also, all applicants must take appropriate aptitude tests before being considered for employment. This careful screening process and final evaluation by the plant manager assures a high level of qualification for all plant personnel including those performing inspections, examinations, and tests. Periodic evaluations of work performance are also conducted to assure a continued high level of qualification.

As a general rule, all technically oriented personnel associated with Point Beach have as a minimum a high school education or equivalent education and experience. All personnel are provided the necessary training to assure acceptable proficiency and are not permitted to function independently of fully qualified personnel until adequate proficiency has been demonstrated. Additionally, all personnel, including contractors, required to work in radiation environments receive health-physics training which includes ALARA considerations. For general inspections and tests, only one level of personnel qualification is utilized at Point Beach versus three levels as indicated in ANSI N45.2.6. However, such matters as review and approval of inspection, examination, and testing procedures and evaluating the adequacy of such procedures are accomplished by supervisory staff or other management personnel within the company.

Based on the above discussions, we believe that the existing Point Beach quality assurance activities are accomplished in a manner which satisfies the intent of Regulatory Guides 1.58 and 1.146. Our experience has shown the present methods for

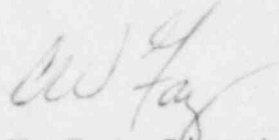
Mr. H. R. Denton

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controlling the qualification of inspection, examination and testing, and audit personnel to be highly successful.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. W. Fay".

C. W. Fay, Director
Nuclear Power Department

Copy to NRC Resident Inspector