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NRC-91-007

January 25, 1991

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Stop P1-137
Washington, D.C. 20555

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
STAFF AUGMENTATION IN EMERGENCY SITUATIONS
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

NUREG-0654, Table B-1, defines the minimum shift staffing and augmentation requirements for emergency situations at nuclear power plants. It requires the capability to augment plant staff for the performance of certain emergency functions within 30 minutes of an emergency declaration. By letter dated February 18, 1982, we provided a description of how we planned to meet the minimum shift staffing and staff augmentation requirements of NUREG-0654, Table B-1. The NRC staff approved our manning and staff augmentation in a safety evaluation dated June 10, 1983.

In our February 18, 1982 submittal, we stated that a Duty and Call Superintendent (DCS) is available at all times for consultation with the Duty Shift Superintendent (DSS) via redundant means of communication. As stated in our submittal and the NRC staff's SER, the DCSs are committed to respond to the plant within 30 minutes in the event of an emergency. The 30 minute augmentation time was based on the shortest augmentation time for emergency response in NUREG-0654, Table B-1. At that time, all DCS qualified personnel lived within 15 miles of the plant site. This distance was included in our submittal to illustrate the capability for 30 minute augmentation and was specifically referenced by the NRC staff in their safety evaluation.

We recently qualified new Duty and Call Superintendents and desire to place them in the duty and call rotation in order to maintain a reasonable duty schedule. One of the newly qualified personnel resides just outside 15 miles from the plant site. All of our Duty and Call Superintendents will no longer reside within 15 miles of the plant site. However, all of the PBNP Duty and Call Super-

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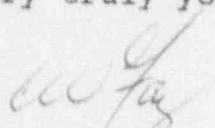
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intendents will be required to reside in proximity to the plant site such that they will continue to be capable of responding to PBNP within 30 minutes of an emergency declaration as required by NUREG-0654.

We have taken action to improve the notification and response capabilities of our Duty and Call Superintendents. Our DCSSs are presently equipped with a cellular phone when on duty which enhances their ability to respond to emergency situations at Point Beach Nuclear Plant. The use of the cellular phones will enhance our capability to notify and communicate plant status data to the DCS, and will be of particular value when the DCS is responding in transit to the plant site. The ability to communicate to the DCS while in transit to the plant site will enable the DCS to be better briefed on the emergency situation and better able to provide immediate assistance when he arrives at the site.

If you require additional information or have any questions, please contact us.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Copies to NRC Regional Administrator, Region III
NRC Resident Inspector