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VPNPD-93- 094

NRC-93- 056

April 30, 1993

Document Control Desk  
U.S. NUCLEAR REGULATORY COMMISSION  
Mail Station P1-137  
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
RESPONSE TO NOTICE OF VIOLATION  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter from Mr. T. O. Martin dated April 2, 1993, the Nuclear Regulatory Commission forwarded to Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, the results of a routine team inspection performed by Mr. H. A. Walker and others from October 13 through November 5, 1992 and January 11 through February 4, 1993. This inspection report included a Notice of Violation (Notice). The Notice describes a violation of 10 CFR 50 Appendix B, Criterion V.

We have reviewed this Notice and, pursuant to the provisions of 10 CFR 2.201, have prepared a written response of explanation concerning the identified violation. Our written response is included as an attachment to this letter.

10 CFR 50 Appendix B, Criterion V, as implemented by Point Beach Quality Assurance Program Section 1.8.5, "Instructions, Procedures, and Drawings," requires that activities affecting quality be prescribed by documented instructions or procedures and that those activities be accomplished in accordance with these instructions or procedures. These instructions and procedures shall include appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished.

This violation represents several deficiencies in the use of procedures. Our corrective actions taken and proposed respond to the specific instances of not following procedures and also address the larger problem of procedural adherence in general.

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We believe that the attached reply is responsive to the concerns and fulfills the requirements identified in your April 2, 1993, letter. Other issues in the Inspection Report include: engineering staffing, prioritization of modifications, Main Steam Isolation Valve modification status, the new modification screening process, timely evaluation of Operating Experience, and frequency of comprehensive performance based engineering surveillances. We will be scheduling a meeting with NRC Region III personnel to discuss our plans and strategies to continue to improve in these areas.

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

Sincerely,



Bob Link  
Vice President  
Nuclear Power

CAC/jg

Enclosure

cc: Regional Administrator, NRC Region III  
NRC Resident Inspector

## REPLY TO NOTICE OF VIOLATION

WISCONSIN ELECTRIC POWER COMPANY  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2  
DOCKETS 50-266 AND 50-301  
LICENSE NOS. DPR-24 AND DPR-27

During a routine team inspection performed by Mr. H. A. Walker and others from October 13 through November 5, 1992, and January 11 through February 4, 1993, one violation of NRC requirements was identified. The identified violation was classified as a Severity Level IV. Inspection Report Nos. 50-266/92024(DRS) and 50-301/92024(DRS) and the Notice of Violation (Notice) transmitted to Wisconsin Electric on April 2, 1993, provide details regarding the violation. We agree that the events and circumstances described in the Notice are accurately characterized with the clarifications that we have provided.

In accordance with the instructions provided in the Notice, our reply to the alleged violation includes: (1) the reason for the violation; (2) corrective action taken; (3) corrective action to be taken to avoid further violations; and (4) the date when full compliance will be achieved.

### VIOLATION

10 CFR 50 Appendix B, Criterion V, as implemented by Point Beach Quality Assurance Program Section 1.8.5, requires that activities affecting quality be prescribed by documented instructions or procedures and that those activities be accomplished in accordance with these instructions or procedures. These instructions and procedures shall include appropriate acceptance criteria for determining that important activities have been satisfactorily accomplished.

The following procedures/instructions prescribe activities affecting quality.

- a. Procedure PBNP 3.1.1, "Independent Verification," Revision 2, paragraph 4.3.5, required safety-related electric wires or wire attachments be independently verified.
- b. Procedure PBNP 3.4.12, "Housekeeping," Revision 7, paragraph 2.7, required equipment and material stored in plant operating areas be stored in a manner that would not create seismic concerns for important operational equipment.

- c. Procedure QP 3-1, "Modification Requests," Revision 8, paragraph 3.24.2, required modification packages be reviewed within 90 days after the installation was accepted to verify the modification had been effectively completed or appropriate approval for a delay be obtained.
- d. Surveillance procedures for annual fire system testing and procedures for monthly and quarterly safety injection system testing.

Contrary to the above:

- a. On January 29, 1993, Procedure IWP-288\*C-2 governing installation of Modification Package MR 84-288\*C-2 did not contain instructions to independently verify electrical wires or wire attachments.
- b. On January 29, 1993, gas containers and electrical test equipment in the proximity of important operational equipment in the control building cable spreading room were not stored in a manner to prevent seismic concerns.
- c. On January 29, 1993; 82-104, 84-159, and 86-031 were not reviewed within 90 days and appropriate approvals for delay were not in place.
- d. On January 29, 1993, the following surveillance test procedures did not contain acceptance criteria:
  - \* TS-72 "Annual Fire Pump Capacity Test"
  - \* TS-74 "Annual Underground Fire Main Flow Test"
  - \* IT-01 "High Head Safety Injection Pumps and Valves (Monthly)"
  - \* IT-45 "Safety Injection Valves (Quarterly)"

Our response to this violation is in two parts. The first part covers our response to the examples in the Notice. The second part covers our response to the issue of failure to follow procedures.

#### RESPONSE TO VIOLATION FOR THE EXAMPLES

Response to example (a) independent verification.

##### 1. REASON FOR THE VIOLATION

It is our normal standard and expectation that a sufficient combination of checks and follow-up testing be performed prior to returning equipment to service, for any work performed at

Point Beach, whether it is safety-related or not. This standard is reflected in Procedure PBNP 3.2.6, "Post Maintenance Testing" and in Procedure QP 3-1, "Modification Requests." There are additional, more specific requirements for lifting and installing safety-related leads contained in Procedure PBNP 3.1.1, "Independent Verification." The additional requirement is that installed or lifted safety-related leads be specifically independently verified in the appropriate work procedure.

There were 12 procedures that were used to install Modification MR 84-288. These procedures were reviewed for the lack of independent verification of lifted and installed leads. There were 32 instances where a lead was lifted or installed. Of the 32, 13 did not contain either independent verification or specific documented follow-up testing. During the development of these procedures, the authors and reviewers determined that these 13 applications did not require independent verification. Each of the 13 cases was in a non-safety related circuit. Although there was no documented follow-up testing, an inappropriately installed or lifted lead in each case would have been immediately obvious due to the expected system response. It would also have been observed during the performance of the documented post modification acceptance testing. Therefore, we believe that all of the applicable procedural requirements were complied with, including those contained in Procedure PBNP 3.1.1, "Independent Verification."

Although the specific cases cited were non-safety-related, we do recognize the importance of assuring appropriate installation and lifting of non-safety related leads. This is especially important when the lead is in an area where safety-related circuits could be affected. As previously stated, we have documented standards for verification of work at PBNP, whether the work is safety-related or not. We believe that our procedure requirements were met in this case.

2. CORRECTIVE ACTION TAKEN

The procedures used to install this modification were reviewed. The results of our review are described in Part 1 of this section.

3. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

Based on the discussion provided above, it is our judgement that no further actions are required at this time.



4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

It is our judgement that we are presently in full compliance.

Response to example (b) housekeeping.

1. REASON FOR THE VIOLATION

Procedure PBNP 3.4.12, "Housekeeping," states the requirements for storage of equipment at PBNP. It states in part that the work group responsible for each equipment storage location shall assure that the equipment is stored in a manner which does not present seismic concerns. We agree that the cases cited were not in compliance with that requirement. The reason appears to be inconsistent application and interpretation of the procedure among responsible groups.

2. CORRECTIVE ACTION TAKEN

As stated in the inspection report, we were notified of the condition and corrected the specific examples of unrestrained equipment. The inspection report states that no action was taken to determine if the problem existed in other areas. After the two examples were corrected, other key areas were also examined. As a result, several large, wheeled fire extinguishers were moved outside of areas where they could pose a seismic concern.

3. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

We will evaluate the requirements for storage of equipment contained in PBNP 3.4.12, "Housekeeping." Specifically, we will ensure the requirements for storage of equipment in a manner which does not present seismic concerns are clearly stated. Appropriate revisions to this procedure will be made to further ensure these requirements are clearly understood and consistently interpreted and applied in the future. The Management expectations for storage of equipment will be communicated to all Nuclear Power Department personnel. This communication will be in the form of a memorandum from the Plant Manager.

To verify the effectiveness of the requirements contained in PBNP 3.4.12, we will utilize our existing plant inspection program. Presently, group heads and supervisors perform regular and scheduled plant inspections in accordance with Procedure PBNP 3.4.20, "Plant Inspection Program." Individuals who perform these inspections will be required to verify the proper

seismic storage of equipment in accordance with PBNP 3.4.12, "Housekeeping." We will evaluate this procedure and make appropriate revisions to support this expectation.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Based on internal plant inspections previously completed, both during and after the inspection, we believe we are presently in compliance with this requirement. However, the procedure evaluations, revisions, and issuance will require some time to complete. Therefore, full compliance is expected by August 1993 when the procedure revisions are complete.

Response to example (c) delinquent post-installation modification reviews.

1. REASON FOR THE VIOLATION

The procedural requirement for post-installation modification review within 90 days was added to QP 3-1, "Modification Requests," about 2 years ago to establish and document the expectation for timeliness of modification closeout. The 90-day review time limit was chosen in an attempt to cover all aspects of modification closeout. Some items covered under the current definition of modification closeout warrant this time limit and some do not. Consequently, engineering and management follow through has been inconsistent.

2. CORRECTIVE ACTION TAKEN

To assure immediate compliance with the existing procedure, each responsible engineer has been informed of the need to document an extension request if the 90-day criterion cannot be met.

3. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

We will review all outstanding modifications to verify the 90-day procedural requirement is being met or that the justifications extending the review beyond the 90 days are appropriately documented. This will be completed by May 20, 1993.

Each of the engineers responsible for post-installation modification close-out will be informed that not only is an extension request required if the 90-day criterion cannot be met, but that the request must be evaluated prior to the end of the 90-day interval to ensure the extension is appropriate. This will also be completed by May 20, 1993.

To further enhance our post-installation modification close-out requirements, we will review the 90-day requirement to determine if it is appropriate. Additional flexibility in determining which specific closeout issues require a high priority may be necessary for this process. This review and procedure changes as necessary will be completed by December 15, 1993.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

We will be in compliance with the existing procedure by May 20, 1993. However, further action to enhance our closeout of modifications will be implemented by December 15. Therefore, we expect to be in full compliance by December 15, 1993.

Response to example (d) appropriate acceptance criteria in written procedures and instructions.

1. REASON FOR THE VIOLATION

The following procedures are listed in the Notice as not having acceptance criteria:

- \* TS-72 "Annual Fire Pump Capacity Test"
- \* TS-74 "Annual Underground Fire Main Flow Test"
- \* IT-01 "High Head Safety Injection Pumps and Valves (Monthly)"
- \* IT-45 "Safety Injection Valves (Quarterly)"

Technical Specification Test TS-72 (Revision 8 issued 06/17/91) contains acceptance criteria for specific test parameters within the procedure. TS-72, Section 3.4, "Acceptability Limits," provides vibration, hydraulic, current draw, temperature, oil pressure, and full load running speed acceptance criteria for applicable components tested by the procedure. There is no clearly defined acceptance criterion for overall system performance contained within the procedure. The procedure, in Section 5.2, "Data Analysis," directs personnel through evaluation of the test data obtained with respect to the acceptance criteria set forth in Section 3.4.

Technical Specification Test TS-74 (Revision 13 issued 10/04/91), Section 3.2, requires test data obtained during the current test to be compared with data from the previous test for an acceptability determination. Section 5.3, "Data Analysis," directs personnel through evaluation of the test data with respect to the previous year's test results. This involves a comparison of graphical hydraulic plots (pressure vs. flow) from the test data obtained with the plot from the previous year's



test data. An overall system performance criterion is not contained within the procedure.

As a general rule, inservice test procedures (IT) utilized within the ASME Section XI Pump and Valve Inservice Testing Program at Point Beach do not contain acceptance criteria within the body of the procedure. We have not included acceptance criteria within procedures for two reasons: (1) ASME Section XI, Subsections IWP and IWV, specify numerous conditions under which pump and valve acceptance criteria is to be revised and (2) to ensure that the individual taking the data would not be influenced by knowing the acceptable test values during the testing.

The frequent revision of acceptance criteria, usually following component maintenance, would necessitate numerous test procedure revisions if the acceptance criteria were contained within each of the test procedures. This frequent revision of test procedures to revise acceptance criteria is an excessive and needless administrative burden. Consequently, we have found it more appropriate to list acceptance criteria for pump and valve inservice tests in a single separate procedure, PBNP 4.12.17, "Operations Standing Order for Inservice Testing."

Acceptance criteria specified for pumps and valves in ASME Section XI, Subsections IWP and IWV, have been established in accordance with the Code for those components tested under IT-01 and IT-45, and are listed in PBNP 4.12.17. As with all pump and valve inservice test procedures, IT-01 and IT-45 have steps within the procedure which direct personnel to compare test data with the acceptance criteria listed in the Operations Standing Order.

As part of our response to your letter of May 28, 1992, which transmitted Inspection Report 50-266/92008(DRS); 50-301/92008 (DRS), we upgraded the classification of PBNP 4.12.17 from a non-nuclear safety-related procedure to a nuclear safety-related procedure. Therefore, specifying and managing acceptance criteria for pump and valve inservice testing in a separate document was previously accepted.

2. CORRECTIVE ACTION TAKEN

IR 92024 Section 3.4.4.3, "Procedures Lack Acceptance Criteria," states that licensee personnel explained that acceptance criteria were being added to procedures as the procedures were revised, and that a specific review for acceptance criteria would be performed during the ongoing procedure upgrade program. We would like to clarify that the procedure upgrade program

being referred to is being performed on Maintenance procedures only, not all plant procedures as the inspection report implies. Some Maintenance procedures such as Routine Maintenance Procedures (RMPs) do not contain specific acceptance criteria within the procedure. These are the procedures that are being upgraded.

Section 3.4.4.3 of the inspection report goes on to further state that the licensee plans to revise the procedure writer's guide to incorporate an acceptance criteria section. Revision 1 of our "Writer's Guide for Electrical and Mechanical Procedures," issued on March 26, 1993, provides guidance for the inclusion of acceptance criteria in electrical and mechanical maintenance procedures in paragraph 12.6. Similarly, Revision 0 of our "Writer's Guide for Instrumentation and Control Procedures," issued on January 15, 1993, provides guidance for the inclusion of acceptance criteria in instrumentation and control procedures in paragraph 8.8.

3. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

To enhance Procedures TS-74, "Annual Fire Pump Capacity Test," and TS-74, "Annual Underground Fire Main Flow Test," we will revise these procedures to include the criteria applied by our fire protection engineers in determining overall system performance of fire protection systems and equipment. In addition, we plan to document the basis for fire protection system and equipment acceptance criteria in the PBNP Fire Protection Evaluation Report (FPER). These enhancements are scheduled to be completed by April 1994, prior to the 1994 test cycle for these systems.

The procedure upgrade program is being used to establish appropriate acceptance criteria within our maintenance procedures.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

With the clarifications provided above, we believe we are presently in full compliance, except for the some procedures in the maintenance area. These procedures are being upgraded. The important to safety procedures are being given the highest priority and will be upgraded first. The entire maintenance procedure upgrade project is expected to be completed in 1998.

RESPONSE TO VIOLATION FOR THE FAILURE TO FOLLOW PROCEDURES

1. REASON FOR THE VIOLATION

For the specific examples listed above the reasons for the failure to follow procedures are discussed. This portion of the response addresses the overall issue of following procedures. Through this Notice of Violation, a recent INPO assist visit, evaluation of INPO SOER 92-01, "Reducing the Occurrence of Plant Events through Improved Human Performance," and other internal discussions with our personnel we have recognized some factors which may be contributing to this overall issue. The factors include: (1) a rather complex procedure hierarchy within our Nuclear Power Department; (2) the expectations for work performed within our Nuclear Power Department need to be clearly reiterated to the work force; (3) additional Management oversight during the performance of work activities may be required; and (4) enhanced auditing of work activities following completion of the task may be implemented to evaluate the effectiveness of our procedures for controlling work.

2. CORRECTIVE ACTIONS TAKEN

We have completed our evaluation of INPO SOER 92-01, "Reducing the Occurrence of Plant Events through Improved Human Performance," and have forwarded these recommendations for Senior Management review.

3. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

The failure to follow procedures is a serious concern to us. We are developing plans and strategies to address the issue of procedural compliance.

Existing procedures in our organization have evolved over the life of PBNP and we believe they require some streamlining to achieve good business practice and facilitate compliance. This issue is being pursued by a Strategy Team as part of our formal business planning process. The cost and benefits of streamlining our procedure structure will be assessed and prioritized by June 1993 relative to other activities in our Nuclear Power Department. In conjunction with the evaluation based on our business plan, we believe that actions expected to result from our evaluation of INPO SOER 92-01 will result in improved performance in this area.

The Vice President - Nuclear Power will issue a memorandum to all Nuclear Power Department personnel to clearly define

expectations for procedure compliance. This memorandum will also define expectations for Management involvement and oversight of work activities. This memorandum will be distributed by June 1993.

In order to establish a more effective audit program of post-work activities, our initial efforts will involve the Quality Assurance Section (QAS) meeting with the Nuclear Engineering and Site Engineering Sections to determine if appropriate engineering activities are being covered by QAS audits and surveillances. Based on the results of this review, the scope of existing audits and surveillances will be expanded or additional audits and surveillances will be performed to assure proper coverage of these activities. QAS will review the need to conduct more performance based audits and surveillances of engineering activities by August 1, 1993. Based on the experience gained during this initial effort between QAS and the Nuclear Engineering and Site Engineering Sections, we will evaluate the applicability and need to incorporate additional work activities.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

The need to use and comply with procedural requirements is continuous. The corrective actions discussed in this response provide positive steps to compliance. We believe that improvement in following procedures is occurring and will continue.