



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

April 6, 1982

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
NRC/WE MANAGEMENT MEETING FEBRUARY 25, 1982
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

As a result of the management meeting held at Point Beach Nuclear Plant on February 25, 1982, additional information was requested concerning Wisconsin Electric's reply of January 13, 1982 in respect to a notice of violation dated December 15, 1981.

The causal factors for the items covered in the October inspection report fall under the following general categories:

1. Procedural inadequacies.
2. Operator awareness.

We recognize that procedural inadequacies can result in improper operator action or operator confusion. Management is acutely aware that plant procedures must be accurate, logical, and clear not only to correctly accomplish the intended purpose of the procedure but also to prevent ambiguity. In support of this philosophy, Point Beach Nuclear Plant has recently developed administrative procedure PBNP 3.16.1, Periodic Procedure Reviews, which requires a review of all plant procedures every two years, although in most cases this was past practice. These reviews will ensure that procedures do not continue in effect without reaffirmation and that procedures are written in a clear, accurate, and logical manner. This review process has already commenced in that the inservice pressure tests performed during the last refueling outage for Unit 1 (fall 1981) have been reviewed and revised as necessary.

Furthermore, Operations is developing standardized procedure formats to ensure that written plant procedures are clear, concise, and logical. These formats are detailed in the following Point Beach Nuclear Plant administrative procedures:

1. PBNP 4.5.1, Emergency Operating Procedures.
2. PBNP 4.5.2, Normal Operating Procedures.
3. PBNP 4.5.3, Refueling Procedures.
4. PBNP 4.5.4, Operating Instructions.
5. PBNP 4.5.5, Checkoff Lists.
6. PBNP 4.5.6, Alarm Response.
7. PBNP 4.5.7, Technical Specification Tests.
8. PBNP 4.5.8, Inservice Inspection Tests.
9. PBNP 4.5.9, Periodic Callups.
10. PBNP 4.5.10, Operating Refueling Tests.

In addition to the above noted administrative procedures, we have developed an Emergency Operating Procedure (EOP) writer's guide which provides the EOP preparer with the criteria necessary to develop the emergency operating procedure set. The EOP writer's guide follows the guidelines of NUREG/CR-2005, "Checklist for Evaluating Emergency Procedures Used in Nuclear Power Plant"; NUREG-0799 (for comment), "Draft Criteria for Preparation of Emergency Operating Procedures"; and Westinghouse Owners Group ERG Seminar, Volumes 1 to 4. All Point Beach EOP's are currently under review for revision in accordance with the guidelines of the Point Beach EOP writer's guide. As the EOP writer's guide techniques become familiar to operating personnel, the techniques will also be applied to other procedures in addition to the EOP's. We believe that this standardized format and periodic procedure review will provide an upgrading and refinement of current and future plant procedures.

The question of operator awareness is an important concern at Point Beach. The philosophy of the Point Beach staff has been that operator awareness can best be implemented by proper supervision rather than additional requirements for documentation. Presently, a control operator completes an eight-page log of plant parameters at the beginning of his shift. Near the end of his shift, the operator prepares a "shift turnover log" which delineates plant status, concentrating on off-normal conditions. The Operating Supervisor is required

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to review the logs of both Control Operators for accuracy and completeness. During the shift, the operator is expected to "walk his boards" to ensure that he is completely familiar with plant conditions. We are willing to review this past mode of operation to determine if additional documentation of the operators' surveillance will improve performance without imposing an administrative burden which may interfere with responsibilities for plant awareness. This review will await the completion of the special investigation described later in this letter.

To assure ourselves and the NRC that positive actions were being taken to improve operator awareness, a meeting was held of all Operations supervision personnel on February 26, 1982 in which the importance of operator supervision, attention to detail, and training were stressed. At this meeting, operations supervisory personnel were reminded of their responsibility to obtain complete operator attentiveness of those personnel under their direction during the conduct of plant operations, and were counseled on the following points:

1. The operator should always be keenly aware of the existing and changing plant conditions during the conduct of any plant evolution. Shift Supervisors and Operating Supervisors have been specifically reminded by the Superintendent-Operations that top priority is to be given to assuring that they and the control operators supervised by them are completely aware of plant conditions at all times.
2. Rather than to rely solely on memory and oral turnover information, operators should accurately document plant status that could affect subsequent plant operation and testing.
3. Operators should ensure they fully understand written procedures prior to conducting plant evolutions governed by those procedures. Revision 5 of PBNP 4.2.1, "Shift Supervisor", and Revision 5 of PBNP 4.2.2, "Operating Supervisor", have specific wording requiring these people to assure personnel awareness of plant conditions. These responsibility statements will be reviewed and appropriately modified to refer to responsibilities towards use of procedures.

While Point Beach Nuclear Plant has operated very successfully for over ten years, we are concerned as to whether changing conditions may be having an adverse impact. As a further response to the concerns expressed by the NRC on February 25, 1982,

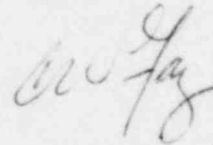
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a special team has been appointed by the Executive Vice President to attempt to determine if any underlying "generic" factors may be affecting personnel performance at Point Beach. The team consists of an experienced industrial psychologist who was involved in the original plant staffing, and a person who formerly held a SRO license at Point Beach Nuclear Plant. The team presently has no direct Nuclear Power Department responsibilities, but has access to all personnel at Point Beach. They will use the incidents discussed at the February 25 meeting for guidance in carrying out their mission. They may also utilize other information brought to their attention by plant personnel or others which will assist their evaluation. Further management action in addition to that discussed above may result from the investigation report which is expected in May 1982.

Very truly yours,



Assistant Vice President

C. W. Fay

Copy to NRC Resident Inspector