



Wisconsin Electric POWER COMPANY
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June 16, 1983

Mr. Richard C. DeYoung, Director
Office of Inspection and Enforcement
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Dear Mr. DeYoung:

DOCKETS 50-266 and 50-301
LOCATION OF EMERGENCY OPERATIONS FACILITY
POINT BEACH NUCLEAR PLANT, UNITS 1 and 2

Thank you for your letter of June 3, 1983 advising us of the status of our request to locate the Emergency Operations Facility (EOF) for Point Beach at our Corporate headquarters in Milwaukee. As you suggested, we have called Mr. Chilk to request a meeting with the Commissioners on this matter.

In response to the Staff position as summarized in your letter, we would note the following:

1. The Staff's assertion that past difficulties with coordination and communications are related to the divided EOF concept is incorrect. These difficulties which related to radio-communication problems with field survey teams, to turn-over responsibilities, and to emergency personnel work loads have already been resolved by new communication apparatus, revised procedures, and assignment of additional staff. More importantly, it should be noted that the divided EOF concept itself has never been an issue with NRC to date. This concept constitutes an enhancement rather than liability of our emergency response capabilities by providing site-access control for both health physics and security purposes. We believe this feature to be highly desirable, although it is not specifically addressed in the existing regulations nor in related guides. The other primary reason for our request is to enhance our response, coordination, and communications capabilities.

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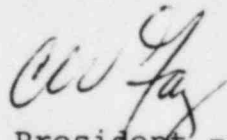
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2. We would emphasize that our proposed location of the EOF is consistent with Emergency Government operations in Wisconsin at both the state and county levels. The approach in Wisconsin is based on headquarters' communications and management, as opposed to personal management in the field. This emergency management method has proved successful in Wisconsin, based on actual experience in non-nuclear emergency situations, such as in tornadoes.
3. Experience with our existing on-site EOF during drills and exercises leads us to the observation that the EOF functions proposed to be located in our Milwaukee headquarters are unrelated to location. The Emergency Director and the Radcon Waste Manager functions remain the same in any room, regardless of its geographic position. The proposed Corporate headquarters location affords substantially reduced mobilization time, enhanced communications capability, and the ease and convenience of operations that are part of familiarity with the everyday working environment.
4. Finally, we note that electronic data displays will be located at the Technical Support Center, Site Boundary Control Center (site portion of EOF), and Emergency Support Center (Corporate headquarters portion of EOF). Sufficient space is available to accommodate NRC personnel at any of these locations as desired.

Again, thank you for your interest in our request. We look forward to meeting with the Commissioners to assure that the advantages of our proposed EOF location are understood.

Very truly yours,



Vice President - Nuclear Power

C. W. Fay

Copies to Messrs. W. J. Dircks
Victor Stello
D. G. Eisenhut
S. J. Chilk
J. G. Keppler✓

NRC Resident Inspector