



**Wisconsin  
Electric**  
POWER COMPANY

231 W Michigan, PO Box 2046, Milwaukee, WI 53201-2046

(414) 221-2345

August 22, 1994

NPL 94-0317

Document Control Desk  
U.S. Nuclear Regulatory Commission  
Mail Station P1-137  
Washington, D.C. 20555

Gentlemen:

DOCKETS 50-266 AND 50-301  
SUBMITTAL OF QUALITY ASSURANCE PROGRAM DESCRIPTION CHANGES  
FOR SUPPLEMENT TO 1994 REVISION OF FINAL SAFETY ANALYSIS REPORT  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In accordance with the requirements of 10 CFR 50.54(a)(3), Wisconsin Electric Power Company, the licensee for Point Beach Nuclear Plant, is submitting proposed revisions to Section 1.8 of the Final Safety Analysis Report (FSAR) for Point Beach Nuclear Plant (PBNP). Section 1.8 of the FSAR describes the current Quality Assurance (QA) Program implemented for PBNP. A summary and justification of the proposed revisions to the program description and the revised FSAR page are attached.

Please review the submittal package and provide any comments in accordance with 10 CFR 50.54(a)(3)(iv). If you have any questions regarding the submittal package, please contact Frank Padovano at (414) 221-3374.

Sincerely,

Gary M. Krieser  
Manager  
Industry and Regulatory Services

cc: NRC Resident Inspector  
NRC Region III Regional Administrator

Attachments

9409010005 940822  
PDR ADUCK 05000266  
PDR

A subsidiary of Wisconsin Energy Corporation

9404

## Attachment 1

### SUMMARY OF PROPOSED CHANGES TO FSAR SECTION 1.8:

Wisconsin Electric proposes to add the following paragraphs to Section 1.8 of the Point Beach Nuclear Plant Final Safety Analysis Report (FSAR):

"Section 5.2.15 of ANSI N18.7-1976 requires in part that plant procedures be reviewed no less frequently than every two years. Wisconsin Electric has determined that programmatic controls exist which are equivalent to, or are more effective in meeting the intent of the standard than the static, fixed biennial review process. The alternative method implements a performance-based process for assuring procedural adequacy by initiating procedure reviews, changes, or revisions based on new or revised source material. The revision controls do not consider age as a requirement for procedure reviews.

This alternative program does not apply to the emergency preparedness program which will continue to be reviewed every 12 months in accordance with 10 CFR 50.54(t); the security program which will continue to be reviewed every 12 months in accordance with 10 CFR 75.55(g)(4); the fire protection program, which will continue to be reviewed every 24 months in accordance with Technical Specification requirements; nor the emergency operating and abnormal operating procedures, which will continue to be reviewed every two years."

### JUSTIFICATION OF PROPOSED CHANGE TO FSAR SECTION 1.8:

Wisconsin Electric's QA program for PBNP presently requires that PBNP procedures be reviewed biennially in accordance with ANSI N18.7-1976. The ANSI standard requires operating plants to review procedures prior to use, and to re-review procedures no less frequently than every two years. The intent of the standard is to ensure that plant procedures are periodically reviewed and revised as necessary to render the procedures current and accurate by incorporating changes, as needed. These changes may be based on continually changing elements such as industry experience, plant behavior, technical information, and user feedback.

Controls, however, exist in various programs at PBNP which are equivalent to, or more effective in meeting the intent of the ANSI standard than the fixed, biennial review process. The proposed alternative method would implement a performance-based process for assuring procedural adequacy by initiating procedure reviews, changes, or revisions based on new or revised source material potentially affecting the contents of plant procedures. The proposed revision controls would not consider age as a requirement for procedure reviews.

Wisconsin Electric has implemented several mechanisms for ensuring timely review and updating of plant procedures. For example, the modification process prompts Nuclear Power Business Unit (NPBU) groups to review procedures potentially affected by a modification. If a group identifies required procedure changes, the modification process assures the completion of the identified changes.

The condition report (CR) program also has provisions for initiating and tracking, to completion, needed procedure changes. One feature of this system is the human performance root cause analysis program. Recommendations arising from the performance of root cause evaluations may be related to procedure changes. The condition reporting process tracks these corrective action recommendations to completion. The QA audit program also results in quality condition reports (QCRs) being generated to document identified program deficiencies. As with CRs, QCR corrective action recommendations, which may include procedure changes, are tracked to completion.

In addition, an operating experience review program ensures that appropriate procedure changes are implemented, based on the review of and recommended corrective actions associated with, INPO Significant Operating Event Reports, Significant Event Reports, Significant By Others Reports, NRC bulletins, NRC information notices, NRC generic letters, and any vendor technical information. This program also utilizes the Nuclear Plant Reliability Data System via the component failure analysis report program to identify any equipment failure trends occurring at PBNP which exceed industry averages. When such adverse trends are identified, condition reports may be generated to track resolution of these trends.

Similarly, the Regulatory Services group at Point Beach performs trend and event analysis of condition reports. These assessments evaluate equipment and personnel performance. Recommendations are forwarded to the responsible group, some of which may result in procedure changes.

Wisconsin Electric is also currently undertaking a procedures upgrade process which encompasses all safety-related and many non-safety-related maintenance procedures utilized at PBNP. This effort involves greater than 600 procedures and is scheduled for completion by the end of 1997.

Finally, the QA audit program is currently structured to review all of the above programs. In addition, procedure effectiveness, as well as procedure usage is evaluated during the performance of all scheduled audits and surveillances. This continued QA review will ensure that the procedure review program is being effectively implemented.

It should be noted that this proposal does not apply to the following programs:

- The Emergency Preparedness program will continue to be reviewed every 12 months in accordance with the 10 CFR 50.54(t).
- The security program will continue to be reviewed every 12 months in accordance with the requirements of 10 CFR 73.55(g)(4).
- The Fire Protection Plan will continue to be reviewed every 24 months in accordance with Technical Specification 15.6.5.1.8.h.
- The Operations Emergency Operating Procedures (EOPs) and Abnormal Operating Procedures (AOPs) will continue to be reviewed every two years.

Based upon the information provided above, Wisconsin Electric believes that this proposed QA program change does not represent a reduction in program effectiveness since program elements are in place that satisfy the criteria of 10 CFR 50 Appendix B and previously accepted commitments as contained in the FSAR. Wisconsin Electric also believes that this proposed review process will meet the intent of the requirements of ANSI N18.7-1976. A safety evaluation was performed in accordance with 10 CFR 50.59 and it was concluded that the proposed change does not create an unreviewed safety question nor require a change to the Technical Specifications.



from the Duty Shift Superintendent for temporary changes. For a further description of the system for temporary changes, refer to Section 15.6.8 of the Technical Specifications.

Section 5.2.15 of ANSI N18.7-1976 requires in part that plant procedures be reviewed no less frequently than every two years. Wisconsin Electric has determined that programmatic controls exist which are equivalent to, or are more effective in meeting the intent of the standard than the static, fixed biennial review process. The alternative method implements a performance-based process for assuring procedural adequacy by initiating procedure reviews, changes, or revisions based on new or revised source material. The revision controls do not consider age as a requirement for procedure reviews.

This alternative program does not apply to the emergency preparedness program which will continue to be reviewed every 12 months in accordance with 10 CFR 50.54(t); the security program which will continue to be reviewed every 12 months in accordance with 10 CFR 75.55(g)(4); the fire protection plan, which will continue to be reviewed every 24 months in accordance with Technical Specification requirements; nor the emergency operating and abnormal operating procedures, which will continue to be reviewed every two years.

Section 5.3.2 of ANSI N18.7-1976, which discusses the content of procedures, states in part, "...procedures shall include, as appropriate...(8) Acceptance Criteria." We have determined that the incorporation of acceptance criteria is not always advantageous, as discussed herein.

#### 1.8.6 DOCUMENT CONTROL

Procedures and practices are established and documented to control the issuance and revision of documents, such as: maintenance and modification procedures; design specifications; design, manufacturing, construction, and installation drawings; procurement documents; manufacturing, inspection, and testing instructions; test and operating procedures; QA manuals; safety analysis reports; and related design criteria documents. The procedures identify responsibility for review, approval, and issuance of the documents and associated changes. For quality related documents, the review includes an assessment of applicable quality requirements.

The procedures provide assurance that documents, including changes, are reviewed for adequacy, approved for use by authorized personnel and distributed to and used at the location where the prescribed activity is performed prior to commencement of the activity. These include prompt issuance of changes and control of the obsolete or superseded documents to prevent inadvertent use. Controls, such as maintenance and distribution of indices, are also implemented to identify current revision of documents to be used. Document control procedures include provisions for determining responsibility for review of changes to documents.

Documents classified as QA records are subjected to the additional requirements described in Section 1.8.17.