



231 W Michigan, P.O. Box 2046, Milwaukee, WI 53201

(414) 221-2345

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U. S. NUCLEAR REGULATORY COMMISSION
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Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
TECHNICAL SPECIFICATION CHANGE REQUEST 120
STAFF ORGANIZATION CHANGES AND
DELETION OF ORGANIZATION CHARTS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated August 1, 1989, and subsequently modified by letter dated March 29, 1990, Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, requested license amendments to document changes to the staff organization and to permit removal of the staff organization charts from the technical specifications as permitted by the NRC guidance in Generic Letter 88-06. During a telephone call on June 27, 1991, Mr. Robert Samworth, the NRC NRR Project Manager for the Point Beach Plant, discussed with Mr. Charles Krause of my staff two additions the NRC staff intends to make concerning this change request.

The first of these additions concerns our proposed specification 15.6.2.1.a which reads:

"The organizations for facility management and technical support are provided in the Point Beach Nuclear Plant Final Safety Analysis Report."

Mr. Samworth has proposed that this paragraph be replaced by paragraph 6.2.1.a from enclosure 2 to the staff Generic Letter 88-06 dated March 22, 1988 which reads:

"Lines of authority, responsibility, and communication shall be established and defined for the highest management levels through intermediate levels to and including all operating organization positions. These relationships shall be documented and updated, as appropriate, in the form of organization charts, functional descriptions of departmental

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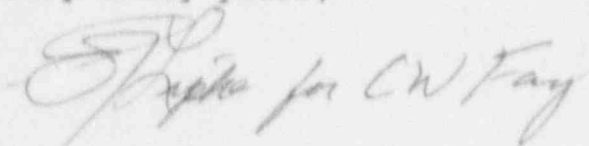
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responsibilities and relationships, and job descriptions for key personnel positions or in equivalent forms of documentation. These requirements shall be documented in the Final Safety Analysis Report or plant procedures."

We have discussed this addition to our proposed specification internally and have no objection to this NRC revision.

The second concern discussed with Mr. Samworth involved our proposed deletion of Figures 15.6.2-3 and 15.6.2-4 which address the fire protection organization. As discussed on page 3 of our August 1, 1989 letter, we proposed deletion of these figures because the essential elements of the fire brigade organization are contained in specification 15.6.2.2.f, and the fire protection organization and fire brigade organization charts are contained in the Point Beach "Administrative Control Policies and Procedures Manual" in procedure PBNP 1.7.5. Mr Samworth indicated that it was his intention to include a statement which references this procedure directly in specification 15.6.2.2.f. We are concerned that a reference to the organization charts being documented in a specific procedure, PBNP 1.7.5, could necessitate a future technical specification revision if the specific reference changed. Accordingly, we believe a general reference to plant procedures, similar to the treatment discussed in the first item addressed in this letter, is more appropriate. We would have no objections to the NRC including such wording in the Technical Specification.

Very truly yours,



C. W. Fay
Vice President
Nuclear Power

Copy to: NRC Resident Inspector
NRC Regional Administrator