



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

September 22, 1983

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
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-266/83-13 AND 50-301/83-13

The following is in response to the routine safety inspection report dated August 23, 1983. The Notice of Violation stated that on June 15, 1983, contrary to Technical Specification 15.6.7.1 and WMTP 2.4, Major, Revision 1, during core loading activities, a fuel assembly was placed into the core and released without proper verification of manipulator crane mast elevation. This resulted in the fuel assembly leaning over approximately 30°. The Notice of Violation also stated that on May 31, 1983, contrary to 10 CFR Part 50, Appendix B, Criterion VI, Routine Maintenance Procedure (RMP) #7, Revision 7, was used to perform the closeout inspection of the "B" steam generator. RMP #7, Revision 8, had been previously issued on May 3, 1983. Both of these items are accepted as items of noncompliance.

In regard to the first violation, the Core Loading Supervisor involved has been instructed on the use of procedures and good engineering practices when operating the refueling equipment. Training will also be conducted with Operations personnel on the importance of use of procedures and good engineering practices when operating the refueling equipment. This training will be conducted on December 1, 1983. A review of the applicable procedures has shown them to be complete and adequate.

In regard to the second violation, Paragraphs 4.a and 4.b of the "Details" section of the inspection report need to be addressed. It is true no guidelines exist for when to issue a temporary change; however, it is implied in PBNP 2.1.1, "Classification, Review and

Approval of Procedures", that the responsible group head will make changes when he deems it necessary. He will process these procedural changes as temporary changes or permanent changes in accordance with PBNP 2.1.1, Sections 4.5 through 4.8. These sections specify how changes to a procedure shall be approved prior to use. This procedure is intended to prevent the amendment of a procedure while maintenance or operation is in progress at a later date.

The procedure change review and approval sheet is a guide for routing and approval and is controlled as a form for use as specified in Section 7.0 of PBNP 2.1.1.

RMP #7, "Minor, Routine Maintenance Procedure, Opening Steam Generator Primary Side", Revision 8, was in fact signed off in the "non-nuclear safety-related" block of the procedure review form. It should have been signed in the "minor" procedure block of the form. However, it is important to note that the review and approval process was for a "minor" procedure and was performed as required in accordance with PBNP 2.1.1, Section 4.8.

No reasons for the proposed changes to RMP #7, Revision 7, and Revision 8 were stated on the change form due to the fact that the changes made were for clarification and internal consistency only. No changes were made that altered the intent or substance of the procedure. In a case where an intent is changed, the reason for the change would be stated.

RMP #7, Revision 7, was indeed issued on June 11, 1982; however, the "issue" date is for clerical use and is an anticipated date only. The date of approval is the date upon which use of the procedure is allowed. The revision to this procedure was controlled and the revision was not distributed for use until all required reviews and approvals were accomplished. This approval was accomplished on June 14, 1982.

For the reasons stated above and evidenced by the numerous procedure revisions performed in accordance with PBNP 2.1.1, we believe that this violation is an isolated incident and should not be generalized as a lack of document control.

The decision of the Maintenance and Construction Group Head not to change revisions of RMP #7 in the middle of steam generator maintenance activities was based on two items. One, the length of time to perform the RMP was significant. Work under RMP #7, Revision 7, was started on April 6, 1983, and completed on June 30, 1983. Secondly, Revision 8 was simply intended to make the check-off sheet (Step 4.1) consistent with the text (Section 3.4) and did not change the intent of the procedure. It is agreed that a temporary change to RMP #7, Revision 7, in accordance with PBNP 2.1.1 was in order.

Therefore, training has been and will be conducted with plant employees, including the maintenance group, regarding the proper use of

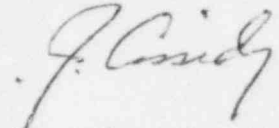
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temporary and permanent changes to procedures in accordance with PBNP 2.1.1. Also, a review of PBNP 2.1.1 is being conducted in order to clarify and improve the procedural change process. These actions will be completed by January 1, 1984.

Very truly yours,

A handwritten signature in cursive script, appearing to read "T. J. Cassidy".

Senior Vice President

T. J. Cassidy

Copy to NRC Resident Inspector