



Wisconsin Electric POWER COMPANY
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December 30, 1983

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

Dear Mr. Keppler:

DOCKET NOS. 50-266 & 50-301
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-266/83-11 & 50-301/83-19
POINT BEACH NUCLEAR PLANT, UNITS 1 & 2

Your letter dated November 30, 1983 forwarded Inspection Report Nos 50-266/83-11 and 50-301/83-19 concerning the results of routine safety inspections conducted by Messrs. P. C. Lovendale and P. A. Paul from September 23 through November 20, 1983. Also enclosed with that letter was a Notice of Violation which discussed two items of apparent noncompliance with NRC requirements and a Notice of Deviation which discussed an apparent deviation from commitments which were made in previous correspondence with the NRC. Pursuant to the provisions of 10 CFR 2.201, Wisconsin Electric, as licensee for the Point Beach Nuclear Plant, hereby submits the following written reply to this Notice of Violation and Notice of Deviation.

The first item identified in the Notice of Violation stated that, contrary to 49 CFR 173.444(c), the drivers of spent fuel shipments from West Valley to Point Beach on two separate occasions were not provided with specific written instructions for maintenance of the exclusive use shipment controls.

The words "sole use" were checked off on the Radioactive Material Shipment Record included in the shipping papers sent with the shipments. In addition, beginning on November 13, 1983, the words "to be unloaded only by consignee" were written on the bill of lading included with the shipping paper. Our discussion with personnel at West Valley Nuclear Services indicated that they believed that these words were sufficient written instructions for maintenance of the exclusive shipment control. Nevertheless, to expand upon and clarify the Point Beach position, on

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December 30, 1983

November 18, 1983, a copy of Point Beach Nuclear Plant form CHP-138, "Carrier/Driver Instructions for Radioactive Material Shipment," was telecopied to the West Valley facility. Clear copies were later sent by mail.

Subsequent to that date, the West Valley Nuclear Services representatives stated to us that these instructions from Point Beach were given to the driver for the spent fuel shipments from West Valley to Point Beach and the driver turned them in to the Tri-State office at Joplin, Missouri. However, the driver's instructions were not attached to the shipping papers filed at Point Beach Nuclear Plant for two West Valley shipments that arrived at Point Beach Nuclear Plant after November 18, 1983. Therefore compliance with the regulation could not be verified for those two shipments.

We have now instructed our technicians receiving the shipments to obtain copies of the instructions for our files. All shipping papers received since December 4, 1983, include copies of the driver's instructions. The corrective action fulfills the commitments regarding the citation and establishes full compliance with the regulations.

The second item of noncompliance identified in the Notice of Violation concerns the licensee's failure to comply with Technical Specification 15.6.8, which requires adherence to plant procedures, during a high airborne radioactive release in Unit 1 containment on November 3, 1983. Specifically, the citation states that the control room was not notified of the high airborne levels until after the containment was evacuated.

This event occurred during plasma arc cutting of the Unit 1 "B" steam generator hot leg reactor cooling piping. On November 2, 1983, the steam generator cold leg had been successfully completed at 2150 hours. During the cold leg cut, general area air samples exhibited no unusual or unexpected iodine airborne radioactivity. Ventilation ducts used to draw suction directly over the cold leg cut locations were repositioned to take suction directly over the hot leg cut. The hot leg plasma arc cut was initiated at 0855 hours on November 3, 1983. At approximately 0920 hours, a continuous air monitor on containment El. 66', located next to the "B" steam generator cubicle, alarmed. The continuous air monitor is conservatively set to alarm at 100 counts above the background ambient readings. Health Physics technicians immediately began to draw high volume air samples. An announcement was made over the contractor page system for personnel to evacuate containment. At the time of the evacuation announcement, actual airborne concentrations were not known. A general area high volume air sample extracted from El. 66' was gross counted at 0935 hours. The result exhibited airborne concentrations greater than maximum permissible concentrations. The sample was forwarded to the PBNP chemistry

lab for isotopic identification. A second high volume air sample taken from El. 66' of containment was gross counted at approximately 0940 hours. The results confirmed airborne concentrations above the maximum permissible concentration.

Special Order PBNP 83-06, "Westinghouse Steam Generator Replacement Project Emergency Plan and Implementing Procedures," states that the control room will be notified of any containment general air airborne levels in excess of the maximum permissible concentration (MPC). At the time of confirmation of air concentrations in excess of MPC, all personnel had evacuated or were in the process of exiting containment. Health Physics supervisory personnel were actively evaluating the conditions. Preoccupation with assessment of the radiological condition and accountability of personnel delayed notification of the PBNP control room personnel. The control room was notified of the excessive airborne concentrations in containment at approximately 1000 hours. Therefore, approximately 20 minutes had elapsed following confirmation of airborne concentrations in excess of 1 MPC before the control room personnel were notified.

An incident critique was conducted between WE Special Projects personnel and Westinghouse site management following the November 3, 1983, containment evacuation. Failure to notify PBNP control room promptly was discussed during the critique. The requirement and importance of notifying the control room personnel of high airborne concentrations in containment was reaffirmed. Craft labor superintendents were also reinstructed during a shift turnover meeting of the requirements to notify the control room personnel as required by the Westinghouse Steam Generator Replacement Project (SGRP) Emergency Plan Implementing Procedures.

To avoid any further noncompliance with the Westinghouse SGRP Emergency Plan Implementing Procedures, a Westinghouse memo has been written and distributed to SGRP personnel reinstructing them in the requirements to notify the PBNP control room as required by the Emergency Plan Implementing Procedures. It is expected these corrective actions will achieve full compliance with the control room notification requirements of the Westinghouse SGRP Emergency Plan Implementing Procedures.

The following is in response to the Notice of Deviation which stated that Westinghouse Health Physics Operating Instructions (HPOI's) did not receive the required review as stated in our letter to Mr. H. R. Denton, attention Mr. Robert A. Clark, dated February 22, 1983. In that letter we stated that Westinghouse anticipated adapting the health physics procedures contained in the Point Beach Health Physics Administrative Control Policies and Procedure Manual. Deviations from these procedures or health physics procedures developed by Westinghouse were to be subject to review and approval by members

December 30, 1983

of the WE Special Projects Division and the PBNP Manager's Supervisory Staff, when applicable. Our letter contained a flow chart depicting the procedure review process.

Each requested exception to existing procedures and new health physics procedures developed by Westinghouse was reviewed by the Special Projects Health Physics Coordinator. All of the procedural deviations and new procedures developed by Westinghouse were reviewed by the Health Physics Coordinator and forwarded to the Superintendent-EQRS with the exception of the Westinghouse Health Physics Operating Instructions. The Health Physics Operating Instructions were developed to provide guidance to Westinghouse radiation exposure monitoring system (REMS) personnel. The instructions include guidance on the handling of paperwork required to support the operation of the REMS and the actual operation of the REMS. These operating instructions were reviewed and approved by the WE Health Physics Coordinator.

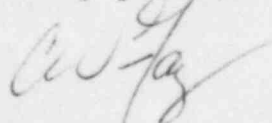
The WE Health Physics Coordinator evaluated the content of these operating instructions and compared the content with existing PBNP procedures. Since there was no similar function or activity accomplished by plant health physics personnel governed by a procedure or a Health Physics Standing Order, the Health Physics Coordinator, functioning as a group head, classified the Westinghouse Health Physics Operating Instructions as being equivalent to PBNP Health Physics Standing Orders. In accordance with past practice, Health Physics Standing Orders have not required Manager's Supervisory Staff review.

The Westinghouse Health Physics Operating Instructions are now being reviewed by the Superintendent-EQRS and members of PBNP Chemistry & Health Physics Group. The operating instructions will be classified and a determination made by January 31, 1984 whether plant Staff review and approval is required.

Any future health physics procedural deviations or new health physics procedures developed by Westinghouse will be reviewed by Special Projects personnel and will then be forwarded to the Superintendent-EQRS for review to determine if Manager's Supervisory Staff review and approval is required.

The above actions are considered to be in accordance with commitments which were made to the NRC in our letter to NRC dated February 22, 1983.

Very truly yours,



C. W. Fay
cc: NRC Resident Inspector

Vice President - Nuclear Power