



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

March 6, 1984

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

Attention: Mr. C. J. Paperiello, Chief
Emergency Preparedness and
Radiological Safety Branch

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
INSPECTION REPORT NOS. 50-266/83-25 AND 50-301/83-23
REVISED EMERGENCY PLAN SAFETY EVALUATION REPORT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated February 2, 1984 forwarded a NRC Safety Evaluation Report concerning the Emergency Plan developed by Wisconsin Electric Power Company (Licensee) for the Point Beach Nuclear Plant, Units 1 and 2. The final section of that report concludes that upon satisfactory clarification of twenty listed items Licensee's emergency plans will meet the planning standards of 10 CFR 50.47(b) and the requirements of 10 CFR 50, Appendix E. Attachment A to this letter addresses each of the twenty clarifications required by your Safety Evaluation Report.

Also enclosed with your February 2 letter was an Appendix A, "Deviation From Commitment", which discussed two apparent deviations from commitments which had been made by Wisconsin Electric Power Company in previous correspondence. These involved past commitments to formalize our agreement with the City of Two Rivers to provide ambulance service in the event our plant emergency vehicles are otherwise unavailable and to obtain a letter of agreement with Bechtel Power Corporation for technical assistance. We believe our present letter of agreement with the City of Two Rivers, dated November 25, 1982 (copy attached), adequately acknowledges our agreement. Regarding Bechtel Power Corporation we have initiated and sent a letter requesting their agreement in these matters. We shall promptly follow up on this action, as necessary, to ensure that a suitable letter of agreement is returned as soon as practicable. Concerning the periodic update of letters of agreement every two years, our corrective action for this item is discussed under Topic 1 in Attachment A to this letter.

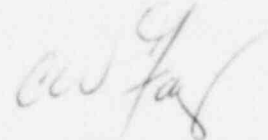
Mr. J. G. Keppler

-2-

March 6, 1984

A number of the responses contained in the attachment discuss revisions we are proposing to the Emergency Plan. It is our intention to have the Emergency Plan revised to reflect these changes or commitments by July 1, 1984 unless otherwise stated. Please contact us if you have any questions concerning our proposed actions in these matters.

Very truly yours,

A handwritten signature in dark ink, appearing to read "C. W. Fay", is written over the typed name.

Vice President-Nuclear Power

C. W. Fay

Attachments

Copy to NRC Resident Inspector

Mr. James J. Each, Manager
Point Beach Nuclear Plant
WISCONSIN ELECTRIC POWER COMPANY
6610 Nuclear Road
Two Rivers, WI 54241

Plant 11-15-2 LA
TR City

Dear Mr. Each:

By signature below, I hereby affirm and acknowledge that the City of Two Rivers will cooperate to the extent possible to make available the Emergency Rescue Service of the Two Rivers Fire Department and make the facilities of the Community House available for use upon notification by Wisconsin Electric Power Company of an accident/emergency at Point Beach Nuclear Plant.

The telephone contacts for use of the Two Rivers Rescue Service are (24 hour availability):

<u>793-1155</u>	(Direct contact)
<u>684-4441</u>	(Manitowish County Ambulance Service)

The telephone contacts for the use of the Two Rivers Community House are:

793-1338

Correspondence concerning these matters should be directed to:

James R. Grassman
City Manager
P.O. Box 87
Two Rivers, Wis. 54241

James R. Grassman
Date: 11-15-82

EMERGENCY PLAN CLARIFICATIONS
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

1. Letters of Agreement for support and assistance from off-site facilities and organizations that are over two years old should be updated (Planning Standard A).

RESPONSE

Your inspection reports identified five letters of agreement contained in Appendix D to the Emergency Plan which were more than two years old. Since the dates of your last inspection, we have received three updated agreement letters. These were received from the Two Rivers Community Hospital, Town of Two Creeks, and the Two Creeks Volunteer Fire Department and are dated January 27, February 13, and February 8, 1984, respectively. In order to provide further assurance that all letters of agreement are renewed every two years, we shall begin in December 1984, when a number of the present letters of agreement will require updating, a systematic renewal of all letters of agreement in that month. Thereafter, every two years in the month of December, all letters of agreement will be updated and renewed. Of course, if the specifics of an agreement with an outside agency or firm are required to be amended or changed, a revised letter of agreement would also be promptly executed at that time.

2. The Letter of Agreement with the City of Two Rivers Fire Department should be expanded to indicate that they will provide an emergency vehicle for the transport of injured and contaminated personnel (Planning Standard A).

RESPONSE

Our response to this item is discussed in the cover letter.

3. A Letter of Agreement with the Bechtel Power Corporation to provide technical assistance if necessary should be provided (Planning Standard A).

RESPONSE

Our response to this item is discussed in the cover letter.

4. The emergency plan should be clarified to indicate that the Communicator and Rad/Chem Technician are part of the normal plant organization, as well as clarify the timeliness with which additional personnel will be augmented as outlined in Table 2 of Supplement 1 of NUREG-0737 (Planning Standard B).

RESPONSE

EP 5.0, "Organizational Control of Emergencies", Section 2.0, "Normal Plant Organization", will be revised to document our

commitments dated May 19, 1982 to have an on-shift Communicator available using security personnel and an on-shift Rad/Chem Technician during the day shift six days a week and the evening shift on five days a week. EP 5.0 will also be revised to specify guidelines for the timeliness with which additional personnel are called in to augment the shift organization in case of an emergency.

5. The emergency plan should be modified to include the anticipated response times to obtain assistance from off-site facilities and organizations (Planning Standard C).

RESPONSE

As recommended in the guidance in NUREG-0654, the anticipated response times for federal agencies, the Department of Energy, and the U. S. Coast Guard will be included in a revision to EP 5.0.

6. The emergency plan should be clarified to indicate the provisions that have been made to accommodate state and local personnel at the Emergency Operations Facility (Planning Standard C).

RESPONSE

A brief description of the facilities and approximate floor space available for state and local agency personnel in the Emergency Operations Facility will be included in EP 7.0, Section 2.1.

7. A table of Emergency Action Levels must be included in the emergency plan (Planning Standard D).

RESPONSE

The Emergency Action Levels were removed from the Emergency Plan and put into the Emergency Plan Implementing Procedures. In response to this direction, we will include the Emergency Action Levels in the Emergency Plan as an Appendix B. They will remain classified as a minor procedure.

8. Section 7.1 of Chapter 5.0 of the emergency plan should be clarified to indicate that notification for an Unusual Event will be initiated as soon as possible (Planning Standard E).

RESPONSE

The referenced section will be revised to state that for an Unusual Event notification should be initiated as soon

as possible after the initial classification and must be initiated within one hour of the initial classification.

9. Terminology used in the emergency plan should be clarified between Joint Public Information Center and Emergency News Center. The time at which the Joint Public Information Center is to be activated should be clarified (Planning Standard G).

RESPONSE

Any references to the Emergency News Center will be changed to Joint Public Information Center. A sentence will be added to EP 7.0, Section 2.6, specifying that the Joint Public Information Center will be activated for a Site Emergency or General Emergency.

10. The emergency plan should clarify the arrangements for dealing with rumors (Planning Standard G).

RESPONSE

A statement that control of rumors will be coordinated at the Joint Public Information Center will be added to EP 7.0, Section 2.6.

11. The emergency plan does not indicate that timely activation of the Emergency Operations Facility will be ensured. This shall include provisions to activate the Emergency Operations Facility within one hour (Planning Standard H).

RESPONSE

The Emergency Plan will be revised to indicate that the Emergency Operations Facility will be activated by plant personnel within one hour of declaration of a Site Emergency or General Emergency and will be staffed by Wisconsin Electric corporate personnel within two hours of the declaration.

12. Discussion of the capability to obtain off-site hydrologic and seismic data should be included in the emergency plan (Planning Standard H).

RESPONSE

Since there is no need for specific hydrologic data, such as current or flow, for an inland lake site, we have no specific provisions for obtaining such data. Lake level can

be obtained from the U. S. Coast Guard. Off-site seismic data are available through the University of Wisconsin-Milwaukee as described in EPIP 1.1. However, it is not our intention, nor is it required, to further discuss these items of remote interest in the Emergency Plan.

13. Clarify how the Technical Support Center and Emergency Operations Facility will obtain on-site meteorological data (Planning Standard I).

RESPONSE

Meteorological data are presently obtainable from the control room by telephone or via hand-carried data sheet updates. A description of this arrangement will be provided in EP 7.0, Sections 2.1 and 2.2.

14. Clarify in the emergency plan that the goal is to complete assembly/accountability within 30 minutes and that evacuation/assembly will be initiated at a Site Emergency or General Emergency (Planning Standard J).

RESPONSE

Our bases for consideration of plant evacuations are discussed in EP 6.0, Section 5.1.1.d. However, we do not believe automatic initiation of evacuation/assembly upon declaration of every Site Emergency or General Emergency is desirable. For example, certain losses of power are categorized as Site Emergencies, but site evacuation on those bases alone would be neither reasonable nor appropriate. For those cases when evacuation/assembly are initiated, it is our goal to complete personnel accountability in thirty minutes. This goal will be included in a revision to EP 6.0, Section 5.1.1.e.

15. Clarify the basis for making protective action recommendations to state and local agencies, including recommendations based on potential releases (Planning Standard J).

RESPONSE

We have adopted the same protective action guidance as utilized by the state. Recommendations based on potential releases will also reference the guidance provided in NRC IE Information Notice 83-28 and Appendix 1 of NUREG-0654. The commitments to utilize this guidance will be included in a revision to EPIP 1.5, "Protective Action Evaluation".

16. Clarify the information on evacuation routes for the general public. Maps showing preselected radiological monitoring and sampling points should be added to the emergency plan (Planning Standard J).

RESPONSE

Appendix J of the Emergency Plan includes a figure which depicts the major highways in the vicinity of Point Beach which are used as evacuation routes. The evacuation time estimates presented in Appendix J were based on use of these evacuation segments. The general public is informed of these evacuation routes in our annual mailing to all residents within a ten-mile radius of the plant (copy enclosed). A map showing the radiological monitoring and sample points will be included in Appendix C of the Emergency Plan.

17. Clarify in the emergency plan that an exercise will be conducted on an annual basis (Planning Standard N).

RESPONSE

Note that EP 8.0, Section 3.3, clearly states that "the scenario for the annual exercise will be varied ...". Nonetheless, we agree to add an additional clarification to Section 3.2 on drills and exercises.

18. Clarify in the emergency plan that monthly communication tests will be carried out with the NRC (Planning Standard N).

RESPONSE

EP 7.0, Section 3.3, states that there is a direct line with NRC Operations in the control room, Technical Support Center, and Emergency Operations Facility. As you are aware, the NRC Operations Center initiates daily communications to the control room using this line. EP 7.0, Section 3.0, concludes that testing of communication links between the plant and outside agencies are conducted monthly. This will be clarified to emphasize that such tests include communications with the NRC.

19. Clarify in the emergency plan that drills or exercises will include testing the post-accident sampling system on at least an annual basis (Planning Standard N).

RESPONSE

Section 3.3 of EP 8.0 will be revised to provide this clarification.

20. Clarify if the annual review of the emergency plan includes examination of letters of agreement with off-site support groups (Planning Standard P).

RESPONSE

An examination of letters of agreement will be included in the annual Emergency Plan audit. A suitable commitment will be included in Section 3.3 of EP 8.0.