



Wisconsin Electric POWER COMPANY
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July 9, 1984

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

DOCKET NOS. 50-266 AND 50-301
UPDATE TO THE SCHEDULE AND
IMPLEMENTATION STATUS OF NUREG-0737
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This letter provides a summary of the current status of our implementation of NUREG-0737, "Clarification of TMI Action Plan Requirements." There are no new schedular commitments in this letter, only a status of past commitments and a summary of the current implementation schedule. With the exception of the current status of some items and some of the information in Notes II.F.2.1 and II.F.2.3, all of the information in this letter, including the implementation schedule, has been provided in various earlier submittals. The purpose of this letter is to ensure the NRC and Wisconsin Electric agree on which items are outstanding in our TMI Action Plan.

Your review of this letter should be made with reference to the similar Wisconsin Electric submittals of December 23, 1980, March 31 and September 14, 1981, and April 26, 1982. As in those previous submittals, we have not repeated the pertinent notes referenced in the Schedule Table for those items whose status has not changed since the April 26, 1982 letter. One difference between this letter and the April 26 submittal occurs in the "NRC Implementation Schedule" column of the Schedule Table. For those items which we believe the NRC has closed or resolved, we have written "closed" and, in parentheses, listed the reference number of the letter which closed or resolved the item. The references are listed at the end of the enclosed Schedule Table and Notes.

If you have any questions regarding the schedule or accompanying notes, we would be pleased to answer them.

Very truly yours,

Vice President-Nuclear Power

C. W. Fay

Enclosures

Copy to NRC Resident Inspector

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REFERENCES

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3. A. Schwencer (NRC) letter to S. Burstein (WE), April 9, 1980, "Evaluation of Compliance with Category "A" Lessons Learned Requirements"
- 3a. D. G. Eisenhut (NRC) letter To All Operating Reactor Licensees, May 7, 1980, "Five Additional TMI-2 Related Requirements (Applicable) to Operating Reactors"
- 3b. C. W. Fay (WE) letter to H. R. Denton (NRC), May 2, 1980, "Implementation of NUREG-0578"
4. C. W. Fay (WE) letter to H. R. Denton (NRC), June 11, 1980, "Implementation of Five Additional TMI-2 Related Requirements"
- 4a. C. W. Fay (WE) letter to H. R. Denton (NRC), July 8, 1980, "Additional Information Auxiliary Feedwater System"
- 4b. D. G. Eisenhut (NRC) letter To All Licensees of Operating Plants and Applicants for Operating Licenses and Holders of Construction Permits, July 31, 1980, "Interim Criteria for Shift Staffing"
- 4c. C. W. Fay (WE) letter to H. R. Denton (NRC), August 7, 1980, "Qualification of Reactor Operators"
5. C. W. Fay (WE) letter to H. R. Denton (NRC), November 3, 1980, "Status of Duty and Call Technical Advisor Training"
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- 9a. P. F. Collins (NRC) letter to C. W. Fay (WE), October 28, 1980, regarding Item I.A.2.1.3 of NUREG-0737.

- 9b. R. F. Heishman (NRC) letter to Sol Burstein (WE), November 20, 1980, Inspection Report No. 50-266/80-19 and No. 50-301/80-19.
- 10. R. W. Jurgensen (WOG) letter to S. H. Hanauer (NRC), OG-47, December 15, 1980, "Westinghouse Owners Group Response to Item I.C.1 of NUREG-0737"
- 10a. R. C. Youngdahl (EPRI) letter to D. G. Eisenhut (NRC), December 15, 1980, PWR Utilities Position on NUREG-0737, Item II.D.1, Performance Testing of BWR and PWR Relief and Safety Valves (NUREG-0778, Section 2.1.2)
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- 12b. C. W. Fay (WE) letter to H. R. Denton (NRC), December 30, 1980, "Point Beach Nuclear Plant Emergency Plan"
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- 13a. C. W. Fay (WE) letter to H. R. Denton (NRC), January 19, 1981, "Response to NUREG-0737"
- 14. R. W. Jurgensen (WOG) letter to S. H. Hanauer (NRC), OG-48, January 28, 1981, "Emergency Operating Instruction Background Documents"
- 15. C. W. Fay (WE) letter to H. R. Denton (NRC), February 4, 1981, "Technical Specification Change Request No. 65"
- 15a. Sol Burstein (WE) letter to S. J. Chilk (NRC), February 18, 1981, "Emergency Operatings Facility"
- 15b. D. G. Eisenhut (NRC) letter To All Licensees of Operating Plants and Holders of Construction Permits, February 18, 1981, "Post-TMI Requirements for the Emergency Operations Facility (Generic Letter 81-10)"
- 16. C. W. Fay (WE) letter to H. R. Denton (NRC), February 23, 1981, "Additional Responses to NUREG-0737"
- 17. C. W. Fay (WE) letter to H. R. Denton (NRC), February 26, 1981, "Duty and Call Technical Advisor Training"
- 17a. C. W. Fay (WE) letter to H. R. Denton (NRC), February 27, 1981, "Emergency Plan Implementing Procedures"

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25. C. W. Fay (WE) letter to H. R. Denton (NRC), April 14, 1981, "Post-TMI Requirements for the Emergency Operations Facility"
- 25a. R. F. Heishman (NRC) letter to Sol Burstein (WE), April 17, 1981, regarding routine inspection conducted on March 2-31, 1981, of activities at Point Beach Nuclear Plant, Units 1 and 2.
- 25b. R. W. Jurgensen (WOG) letter to P. S. Check (NRC), OG-57, April 20, 1981, "Natural Circulation Cooldown Report"
26. C. W. Fay (WE) letter to H. R. Denton (NRC), May 7, 1981, "Containment Pressure Setpoint, NUREG-0737 Item II.E.4.2"
- 26a. W. A. Wogsland (WOG) letter to L. Beltracchi (NRC), May 19, 1981, "Proprietary Handouts, SAS Meeting, May 14, 1981"
27. D. G. Eisenhut (NRC) letter to R. W. Jurgensen (WOG), May 28, 1981, "WOG Procedures Development and Evaluation Program"
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38. C. W. Fay (WE) letter to H. R. Denton (NRC), July 17, 1981, "Meteorological System Description"
39. R. C. Youngdahl (EPRI) letter to H. R. Denton (NRC), July 24, 1981, "Status of EPRI PWR Safety and Relief Valve Test Program, NUREG-0737, Item II.D.1"
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- 41a. Sol Burstein (WE) letter to S. J. Chilk (NRC), August 12, 1981, "Comments on Incorporation of NUREG-0737 Licensing Requirements into 10 CFR Part 50"
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- 44a. R. L. Spessard (NRC) letter to Sol Burstein (WE), August 26, 1981, regarding routine inspection conducted on July 1-31, 1981, of activities at Point Beach Nuclear Power Plant, Units 1 and 2.
- 45. Sol Burstein (WE) letter to H. R. Denton (NRC), August 28, 1981, "Technical Specification Change Request No. 68, Containment Purge Valve Operability"
- 46. Sol Burstein (WE) letter to H. R. Denton (NRC), September 11, 1981, "Modification of Instrument Power Supply"
- 47. Sol Burstein (WE) letter to H. R. Denton (NRC), September 14, 1981, "Response to NUREG-0737, Update to Schedule Requirements and Implementation Status"
- 48. R. A. Clark (NRC) letter to Sol Burstein (WE), September 14, 1981, regarding acceptance of item II.E.4.1, Dedicated Hydrogen Penetrations in NUREG-0737.
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- 51. T. G. Colburn (NRC) letter to Wisconsin Electric Power Company, October 7, 1981, "Summary of Meeting Held with Licensee to Discuss Integrated Scheduling of NUREG-0737 Items with Other NRC Requirements"
- 52. C. W. Fay (WE) letter to H. R. Denton (NRC), October 20, 1981, "Reactor Vessel Water Level Indication System Description"
- 53. R. W. Jurgensen (WOG) letter to D. G. Eisenhut (NRC), OG-64, November 30, 1981, "Emergency Response Guideline Program"
- 54. R. A. Clark (NRC) letter to Sol Burstein (WE), December 2, 1981, "TMI Action Plan Items I.A.1.3, I.C.5, and I.C.6 as Described in NUREG-0737"
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- 56. C. W. Fay (WE) letter to H. R. Denton (NRC), December 29, 1981, "Functional Description and Proposed Implementation Schedule - Meteorological Monitoring System"

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64. H. B. Clayton (NRC) memorandum for D. L. Ziemann (NRC), February 24, 1982, "Meeting Summary, Westinghouse Owners' Group and Westinghouse Emergency Operating Procedure Guidelines"
65. R. A. Clark (NRC) letter to C. W. Fay (WE) February 25, 1982, "Status of NUREG-0737 Items II.F.1.1 and II.F.1.2 for Point Beach Nuclear Plant, Units 1 and 2"
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68. D. G. Eisenhut (NRC) letter To All Licensees of Operating Power Reactors, March 17, 1982, "Post-TMI Requirements (Generic Letter No. 82-05)"
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- 69a. E. P. Rahe (W) letter to D. G. Eisenhut (NRC), NS-EPR-2581, March 26, 1982, "Westinghouse Small Break ECCS Evaluation Model."
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- 72. R. L. Spessard (NRC) letter to S. Burstein (WE), April 8, 1982, "Installation Deficiencies in Conduit Installed as a Part of TMI Modification Program."
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- 74a. R. A. Clark (NRC) letter to C. W. Fay (WE), April 21, 1982, "Item II.E.1.1, AFW System Evaluation for PBNP, Units 1 and 2."
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- 82. S. Burstein (WE) letter to R. M. Eckert (PSE&G), June 2, 1982, "S.B. Comment on his Views Regarding Shift Staffing."
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- 85. J. A. Calvo (NRC) memorandum for H. R. Denton et al. (NRC), June 25, 1982, "Daily Highlight: Suspension of Completion Schedules for Environmental Qualification of Safety Related Electrical Equipment."
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- 87. C. W. Fay (WE) letter to H. R. Denton (NRC), June 30, 1982, "Further Response to NUREG-0737, Item II.D.1 Relief and Safety Valve Testing."
- 88. S. Burstein (WE) letter to H. R. Denton (NRC), July 15, 1982, "Emergency Support Center."
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- 91. E. P. Rahe (WEC) letter to D. G. Eisenhut (NRC), June 28, 1982, "Supplemental Information of New Small Break LOCA Model to Address NUREG-0737 Item II.K.3.30."
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- 93. R. A. Clark (NRC) letter to C. W. Fay (WE), August 10, 1982, "NUREG-0737 Item III.D.3.4 Control Room Habitability at Point Beach Nuclear Plant" (Attachment: PNL letter dated March 2, 1982).
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- 95. P. S. Kappo (NRC) memorandum for W. R. Butler (NRC), August 23, 1982, "NUREG-0737, Analytical Solutions to Two Problems Pertinent to Items II.F.1.4, 5, 6."
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- 97. D. G. Eisenhut (NRC) letter to All Pressurized Power Reactor Licensees, September 20, 1982, "NUREG-0737 Technical Specifications" (Generic Letter No. 82-16).

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108. R. A. Clark (NRC) letter to C. W. Fay (WE), November 15, 1982, "NUREG-0737 TMI Action Plan Items I.A.2.1, 'Upgrading RO and SRO Training' and II.B.4, 'Training for Mitigating Core Damage'."
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124. R. A. Clark (NRC) letter to C. W. Fay (WE), February 4, 1983, "NUREG-0737 Item II.K.3.25, Loss of AC Power to Reactor Coolant Pump Seals."
125. D. G. Eisenhower (NRC) letter to All Operating Reactor Licensees, February 8, 1983, "Licensee Qualification for Performing Safety Analyses in Support of Licensing Actions" (Generic Letter No. 83-11).
126. D. G. Eisenhower (NRC) letter to All Licensees with Westinghouse (W) Designed Nuclear Steam Supply Systems (NSSSs) (Except Yankee Atomic Electric Company), February 8, 1983, "Resolution of TMI Action Item II.K.3.5, 'Automatic Trip of Reactor Coolant Pumps'" (Generic Letter No. 83-10d).
127. C. W. Fay (WE) letter to H. R. Denton (NRC), February 11, 1983, "Auxiliary Feedwater System Modifications."
128. R. A. Muench (WOG) letter to Technical Specification Subcommittee Members WOG-83-120, February 15, 1983, "NUREG-0737 Items Requiring Implementation Into Plant Technical Specifications" (Attachment is the below letter).
129. D. G. Eisenhower (NRC) letter to D. D. Kingsley (WOG), January 28, 1983, "NUREG-0737 Items Requiring Technical Specifications" (Attachment is DRAFT Generic Letter for Comment on NUREG-0737 Technical Specifications).
130. C. J. Paperiello (NRC) letter to S. Burstein (WE), February 16, 1983, "Routine Safety Inspection of PBNP on January 25-27, 1983."
131. C. W. Fay (WE) letter to H. R. Denton (NRC), February 21, 1983, "NUREG-0737 Item II.B.3, Post-Accident Sampling System."
132. E. L. Jordan (NRC) memorandum for D. G. Eisenhower (NRC), February 24, 1983, "Response to Request for Technical Assistance (Review of Licensee's (WE) Provisions for On-Shift Staffing)."
133. C. W. Fay (WE) letter to H. R. Denton (NRC), February 28, 1983, "Reply to NRC Request for Additional Information on NUREG-0737, Items II.F.1.4, II.F.1.5, and II.F.1.6."
134. D. G. Eisenhower (NRC) letter to All Licensees of Operating Reactors, Applicants for Operating Licensees, and Holders of Construction Permits, March 7, 1983, "Definition of Key Maintenance Personnel", (Clarification of Generic Letter 82-12) (Generic Letter No. 83-14).
135. C. W. Giesler (Wisconsin Public Service Corporation) letter to D. G. Eisenhower (NRC), March 9, 1983, "Inadequate Core Cooling (ICC) Instrumentation System."
- 135a. J. J. Sheppard (WOG) letter to D. G. Eisenhower (NRC), March 14, 1983, OG-91, "RCS integrity Function Restoration Guidelines for the High-Pressure and Low Pressure Versions of the Emergency Response Guidelines Set."
136. R. A. Clark (NRC) letter to C. W. Fay (WE), March 14, 1983, "Confirming Order on Items Set Forth in NUREG-0737."

- 137. C. W. Fay (WE) letter to H. R. Denton (NRC), March 21, 1983, "Reply to Generic Letter No. 82-28."
- 138. C. W. Fay (WE) letter to H. R. Denton (NRC), March 24, 1983, "Auxiliary Feedwater System Operability."
- 139. R. A. Muench (WOG) letter to WOG Representatives, WOG-83-150, March 30, 1983, "Potential for Voiding in the RCS During Transients - NUREG-0737, Item II.K.2.17" (Attached letter is below).
- 140. R. A. Muench (WOG) letter to D. G. Eisenhower (NRC), NSID/WOG-63, February 16, 1983, "Potential for Voiding in the Reactor Coolant System during Transients NUREG-0737 - Item II.K.2.17."
- 141. R. A. Muench (WOG) letter to WOG Representatives and Analysis Subcommittee Members, WOG-83-151, March 31, 1983, "WOG Generic Response to NRC Letters 83-10c & d."
- 142. C. W. Fay (WE) letter to H. R. Denton (NRC), April 5, 1983, "Reactor Coolant System Gas Vent System."
- 143. C. W. Fay (WE) letter to H. R. Denton (NRC), April 11, 1983, "Response to Generic Letter No. 83-10d."
- 143a. J. J. Sheppard (WOG) letter to D. G. Eisenhower (NRC), April 13, 1983, OG-98, "Low-Pressure Version of the Emergency Response Guidelines."
- 144. C. W. Fay (WE) letter to H. R. Denton (NRC), April 15, 1983, "Response to Generic Letter 82-33 Update to Schedule Requirements for Emergency Response Capability."
- 144a. Technical Evaluation Report on the WOG report in response to NUREG-0737 Item II.K.3.2, dated February 15, 1983, revised April 21, 1983.
- 145. W. J. Johnson (W) letter to D. K. Porter (WE), WEP-83-545, May 5, 1983, "Elimination of Postulated RCS Primary Loop Pipe Breaks"
- 146. C. W. Fay (WE) letter to H. R. Denton (NRC), May 6, 1983, "Implementation of TMI-Related Issues."
- 147. D. G. Eisenhower (NRC) letter to All Operating Reactor Licensees and Holders of Construction Permits, May 9, 1983, "Integrated Scheduling for Implementation of Plant Modifications" (Generic Letter 83-20).
- 148. R. A. Clark (NRC) letter to C. W. Fay (WE), May 9, 1983, "Exemption from Scheduling Requirements of 10 CFR 50.44(c)(3)(iii), Reactor Coolant System (RCS) High Point Gas Vents for Unit 2."
- 149. R. A. Clark (NRC) letter to C. W. Fay (WE), May 12, 1983, "NUREG-0737 Item III.A.2.1 Emergency Plan Upgrade to Meet Rule."

150. Preliminary Notification of Event or Unusual Occurrence--PND-111-83-37, PBNP Units 1 and 2, May 18, 1983, "Noble Gas Effluent Monitor Not Installed as Required."
- 150a. C. W. Fay (WE) letter to H. R. Denton (NRC), May 20, 1983, "Environmental Qualification of Electrical Equipment Important to Safety within the Scope of 10 CFR 50.49."
151. C. W. Fay (WE) letter to S. J. Chilk (NRC), May 20, 1983, "Emergency Operations Facility Location."
152. J. G. Keppler (NRC) letter to S. Burstein (WE), May 20, 1983, "Confirms our Commitment to have Noble Gas Effluent Monitors Installed and Operating by June 30, 1983."
153. C. W. Fay (WE) letter to H. R. Denton (NRC), May 25, 1983, "Additional Information NUREG-0737."
154. D. G. Eisenhut (NRC) letter to All Operating Reactor Licensees, Applicants for an Operating License and Holders of Construction Permits for Westinghouse Pressurized Water Reactors, June 3, 1983, "Safety Evaluation of 'Emergency Response Guidelines'" (Generic Letter 83-22) (Attachment is letter below).
155. D. G. Eisenhut (NRC) letter to J. J. Sheppard (WOG), June 1, 1983, "Safety Evaluation of 'Emergency Response Guidelines'."
156. C. W. Fay (WE) letter to H. R. Denton (NRC), June 3, 1983, "Chemical Test Matrix."
157. R. C. DeYoung (NRC) letter to C. W. Fay (WE), June 3, 1983, "Response to our Request to Locate a Portion of the EOF in Milwaukee."
158. J. A. Hind (NRC) letter to S. Burstein (WE), June 10, 1983, "Commission's Review of On-Shift Staffing and Augmentation for Emergency Situations at PBNP."
159. R. A. Muench (WOG) letter to D. G. Eisenhut (NRC), June 14, 1983, "Regulatory Guide 1.97, Rev. 2, Requirements for Reactor Coolant Temperature Indication" (Attachment is a revised letter OG-94 (Revised) dated June 14, 1983).
160. J. J. Sheppard (WOG) letter to D. G. Eisenhut (NRC), June 14, 1983, OG-94 (Revised), "Regulatory Guide 1.97, Rev. 2, Requirements for Reactor Coolant Temperature Indication."
161. R. A. Newton memorandum to J. J. Zach, June 16, 1983, "Additional Inputs to the Backup Computer."
162. C. W. Fay (WE) letter to H. R. Denton (NRC), June 16, 1983, "Implementation of Post TMI-Related Issues."

163. C. W. Fay (WE) letter to R. C. DeYoung (NRC), June 16, 1983, "Location of Emergency Operations Facility."
164. C. W. Fay (WE) letter to H. R. Denton (NRC), June 20, 1983, "Auxiliary Feedwater System Operability."
165. R. A. Clark (NRC) letter to C. W. Fay (WE), June 21, 1983, "NUREG-0737 Items II.F.1.4 Containment Pressure Monitor System, II.F.1.5 Containment Water Level Monitor System, II.F.1.6 Containment Hydrogen Monitor System for PBNP Units 1 and 2."
166. S. Burstein (WE) letter to H. R. Denton (NRC), June 22, 1983, "Request for Extension of Deadline for Certain Environmental Qualification Items."
167. C. W. Fay (WE) letter to H. R. Denton (NRC), June 29, 1983, "Installation of SA-11 Monitors"
168. C. W. Fay (WE) letter to H. R. Denton (NRC), June 30, 1983, "Electric Power Distribution System."
169. C. J. Paperiello (NRC) letter to S. Burstein (NRC), July 1, 1983, "Refers to Special Safety Inspection Conducted by P. C. Lovendal (NRC)."
170. R. A. Clark (NRC) letter to C. W. Fay (WE), July 12, 1983, "Response to our Request for Modification of NRC Confirming Order of March 14, 1983."
171. C. W. Fay (WE) letter to H. R. Denton (NRC), July 12, 1983, "Containment Atmosphere Sampling."
172. C. W. Fay (WE) letter to J. G. Keppler (NRC), July 27, 1983, "Response to NRC Inspection Report Nos. 50-266/83-08 and 50-301/83-08."
173. C. W. Fay (WE) letter to H. R. Denton (NRC), July 27, 1983, "Reactor Cavity Annulus Seal Ring."
174. R. A. Clark (NRC) letter to C. W. Fay (WE), August 9, 1983, "Review of TMI Item II.K.3.17 Report on Outages of ECC Systems."
175. C. W. Fay (WE) letter to H. R. Denton (NRC), August 24, 1983, "Supplemental Response to Generic Letter 82-33 Schedule Requirements for Emergency Response Capabilities."
176. C. W. Fay (WE) letter to H. R. Denton (NRC), September 1, 1983, "Implementation of Regulatory Guide 1.97 for Emergency Response Capability."
- 176a. Background Information for WOG Emergency Response Guidelines, Generic Issue, Reactor Vessel Liquid Inventory System, September 1, 1983.
177. J. A. Hind (NRC) letter to S. Burstein (WE), September 12, 1983, "Inspection Report 83-14."

- 178. D. G. Eisenhut (NRC) letter to S. Burstein (WE), September 14, 1983, "Refusal to Move Emergency Support Center to Milwaukee."
- 179. J. R. Miller (NRC) letter to C. W. Fay (WE), September 15, 1983, "Modifications to Motor-Drive AFW Pump Isolation Valves."
- 180. J. R. Miller (NRC) letter to C. W. Fay (WE), September 16, 1983, "NUREG-0737 Items II.K.3.1-Automatic PORV Isolation and II.K.3.2-Report on PORV's for PBNP."
- 181. J. R. Miller (NRC) letter to C. W. Fay (WE), September 22, 1983, "NUREG-0737 Item II.B.1, Reactor Coolant System Vents."
- 181a. J. J. Sheppard (WOG) letter to D. G. Eisenhut (NRC) OG-105, September 27, 1983, "Response to Safety Evaluation of the Westinghouse Owners Group Emergency Response Guidelines."
- 182. C. W. Fay (WE) letter to H. R. Denton (NRC), September 30, 1983, "Rule 10 CFR 50 Licensed Operator Staffing at Nuclear Power Plants."
- 182a. S. Burstein (WE) letter to NRC Commissioners, October 6, 1983, "Accident Source Term."
- 183. C. W. Fay (WE) letter to H. R. Denton (NRC), October 10, 1983, "Resolution of Safety Evaluation Reports for Environmental Qualification of Safety-Related Electrical Equipment."
- 184. C. W. Fay (WE) letter to H. R. Denton (NRC) October 10, 1983, "Modification of Implementation of NUREG-0578 (DTA)."
- 185. J. R. Miller (NRC) letter to C. W. Fay (WE), October 12, 1983, "NUREG-0737 Item II.B.1 Reactor Coolant System Vents."
- 186. S. Burstein (WE) letter to D. G. Eisenhut (NRC), October 14, 1983, "Emergency Support Center."
- 186a. J. J. Sheppard (WOG) letter to D. Crutchfield (NRC), October 31, 1983, "Emergency Response Guidelines, Rev.1, Validation Program."
- 187. D. G. Eisenhut (NRC) letter to All PWR Licensees, November 1, 1983, "NUREG-0737 Technical Specifications (Generic Letter 83-37)."
- 188. D. G. Eisenhut (NRC) letter to All Licensees, November 2, 1983, "Clarification of TMI Action Plan Item II.K.3.31 (Generic Letter No. 83-35)."
- 189. J. R. Miller (NRC) letter to C. W. Fay (WE), November 3, 1983, "Post Accident Sampling System (NUREG-0737 Item II.B.3)."
- 190. J. R. Miller (NRC) letter to C. W. Fay (WE) November 3, 1983, "NUREG-0737 Item II.B.2.2 Plant Shielding Modifications for Vital Area Access."

- 190a. C. W. Fay (WE) letter to J. G. Keppler (NRC), November 7, 1983, "Response to NRC Inspection Report No. 50-301/83-11."
- 191. J. R. Miller (NRC) letter to C. W. Fay (WE), November 8, 1983, "Review of Natural Circulation Cooldown (Genreic Letter No. 81-21)."
- 192. R. B. Minogue (NRC) memorandum to R. F. Fraley (ACRS), November 10, 1983, "Revision 1 to Reg. Guide 1.89, 'Environmental Qualification of Electric Equipment Important to Safety for Nuclear Power Plants.'"
- 193. C. W. Fay (WE) letter to H. R. Denton (NRC), November 11, 1983, "Auxiliary Feedwater System Operability."
- 194. C. W. Fay (WE) letter to H. R. Denton (NRC), November 18, 1983, "Emergency Operations Facility."
- 195. C. W. Fay (WE) letter to H. R. Denton (NRC), November 23, 1983, "Resolution of Safety Evaluation Reports for Environmental Qualification of Safety-Related Equipment."
- 196. C. W. Fay (WE) letter to H. R. Denton (NRC), November 29, 1983, "Reactor Coolant System High Point Gas Vents."
- 196a. J. J. Sheppard (WOG) letter to R. J. Mattson (NRC), December 1, 1983, OG-110, "WOG Report on Evaluation of Alternate RCP Trip Criteria."
- 197. C. W. Fay (WE) letter to H. R. Denton (NRC), December 6, 1983, "Core Damage Assessment Methodology, NUREG-0737 Item II.B.3."
- 198. T. G. Colburn (NRC) letter to C. W. Fay, December 28, 1983, "Amendments 79 and 84 to Units 1 and 2, respectively."
- 199. C. W. Fay (WE) letter to H. R. Denton (NRC), December 29, 1983, "Further Response to Generic Letter No. 83-10d, Automatic Trip of Reactor Coolant Pump."
- 200. J. R. Miller (NRC) letter to C. W. Fay (WE), December 29, 1983, "Issuance of Amendment Nos. 80 and 85 to PBNP Units 1 and 2" (AFW System testing).
- 201. J. R. Miller (NRC) letter to C. W. Fay (WE), December 30, 1983, "Shift Manning Rule."
- 202. J. R. Miller (NRC) letter to C. W. Fay (WE), December 30, 1983, "Exemption from Scheduler Requirements of Paragraph (c)(iii) of 10 CFR 50.44 for Installation of Reactor Coolant System High Point Gas Vents."
- 203. H. R. Denton (NRC) letter to S. Burstein (WE), January 3, 1984, "Extension of Deadline Established in 10 CFR 50.49 for Final Environmental Qualification of Certain Safety Related Electrical Equipment."
- 204. C. W. Fay (WE) letter to J. G. Keppler (NRC), January 4, 1984, "Final Response to I. E. Bulletin 79-14."

205. J. R. Miller (NRC) letter to C. W. Fay (WE), January 24, 1984, "NUREG-0737 Item II.K.2.17, Potential for Voiding in the Reactor Coolant System During Transients."
206. T. G. Colburn (NRC) memorandum to J. R. Miller (NRC), January 24, 1984, "Meeting Summary Re: WEPCO Shift Staffing Exemption Request for PBNP, Units 1 and 2."
207. C. W. Fay (WE) letter to H. R. Denton (NRC), January 31, 1984, "Auxiliary Feedwater System Modifications."
208. C. J. Paperiello (NRC) letter to S. Burstein (WE), February 2, 1984, "Safety Evaluation Report on the PBNP Emergency Plan," Report Nos. 50-266/83-25; 50-301/83-23.
209. C. W. Fay (WE) letter to H. R. Denton (NRC), February 14, 1984, "Rule 10 CFR 50 Licensed Operator Staffing."
210. W. D. Shafer (NRC) letter to S. Burstein (WE), February 22, 1984, "Inspection Report No. 266/83-26; No. 301/83-24."
211. C. W. Fay (WE) letter to H. R. Denton (NRC), February 29, 1984, "Specifications for TMI Backfit Instrumentation Technical Specifications Change Request No. 96."
212. J. J. Sheppard (WOG) letter to J. Norris (NRC), February 29, 1984, OG-116, "NUREG-0737, Item II.B.3 Post Accident Core Damage Assessment Methodology."
213. C. W. Fay (WE) letter to H. R. Denton (NRC), March 5, 1984, "Implementation of Post-TMI Related Issues."
214. C. W. Fay (WE) letter to J. G. Keppler (NRC), March 6, 1984, "Inspection Report Nos. 50-266/83-25 and 50-301/83-23 Revised Emergency Plan Safety Evaluation Report."
215. C. W. Fay (WE) letter to H. R. Denton (NRC), March 8, 1984, "Additional Information on Generic Letter 82-33 Schedule Requirements for Emergency Response Capabilities."
216. J. J. Sheppard (WOG) letter to R. J. Mattson (NRC), March 9, 1984, OG-117, "WOG Report on Justification of Manual RCP Trip for SBLOCA Events."
217. J. R. Miller (NRC) letter to C. W. Fay (WE), March 15, 1984, "Resolution of the Issue of Upper Plenum Injection."
218. C. W. Fay (WE) letter to H. R. Denton (NRC), March 19, 1984, "Technical Specification to Limit Overtime."
219. J. J. Sheppard (WOG) letter to J. Norris (NRC), March 23, 1984, OG-118, "NUREG-0737, Item II.B.3 Post Accident Core Damage Assessment Methodology, Revision 1."

- 220. H. R. Denton (NRC) letter to C. W. Fay (WE), March 26, 1984, "Extension Request for Implementation of 10 CFR 50.54 (m)(2)(i)."
- 221. C. W. Fay (WE) letter to H. R. Denton (NRC), March 30, 1984, "Upgraded Emergency Operating Procedures."
- 222. C. W. Fay (WE) letter to H. R. Denton (NRC), April 10, 1984, "Reactor Cavity Annulus Seal Ring."
- 223. C. W. Fay (WE) letter to H. R. Denton (NRC), May 1, 1984, "Final Response to Generic Letter No. 83-10d Automatic Trip of Reactor Coolant Pump."
- 224. T. A. Lordi (WOG) letter to Core Damage Assessment Working Group Members, WOG-84-172, May 2, 1984, "WOG Post-Accident Core Damage Assessment Methodology NUREG-0737, Item II.B.3 NRC Safety Evaluation Report."
- 225. C. W. Fay (WE) letter to H. R. Denton (NRC), May 3, 1984, "Additional Information on Generic Letter 82-33 Schedule Requirements for Control Room Design Review."
- 226. C. W. Fay (WE) letter to H. R. Denton (NRC), May 17, 1984, "Final Response to NUREG-0737, Item II.D.1 Relief and Safety Valve Testing."
- 227. C. W. Fay (WE) letter to H. R. Denton (NRC), June 1, 1984, "Procedures Generation Package Upgraded Emergency Operating Procedures."
- 228. J. R. Miller (NRC) letter to C. W. Fay (WE), June 6, 1984, "NUREG-0737, II.K.2.13, 'Thermo-Mechanical Report,' Point Beach Nuclear Plant."
- 229. C. W. Fay (WE) letter to H. R. Denton (NRC), June 26, 1984, "Implementation of Post-TMI Related Issues."

UPDATE TO NUREG-0737

POST-TMI REQUIREMENTS

FOR OPERATING PLANTS

Point Beach Nuclear Plant, Units 1 and 2

Docket Nos. 50-266 and 50-301

Schedule Table and Notes

Revision 4 - July 9, 1984

Key To Schedule Table

- N. A. = Schedule not applicable to Point Beach Nuclear Plant (PBNP)
- N. R. = Not Required
- TBD = To Be determined at a later date per the remarks
- * = Schedule is based on the timely delivery of equipment
- + = ASIP installation, startup, and testing complete by October 31, 1984 with new instruments integrated into procedures and operator training on procedures complete by January 31, 1985.

Marginal Revision Notation

- None = Original issue dated December 23, 1980 (Reference 12)
- 1 = Revision 1 dated March 31, 1981 (Reference 23)
- 2 = Revision 2 dated September 14, 1981 (Reference 47)
- 3 = Revision 3 dated April 26, 1982 (Reference 75)
- 4 = Revision 4 dated July 9, 1984 (Updated in this submittal)

I.A.1.3.1. Shift Manning-Limit Overtime

The initial requirements for this item were met in 1981 and the item was closed by Mr. R. A. Clark's letter to WE dated December 2, 1981. However, subsequently the requirements were revised in NRC Generic Letters 82-02 and 82-12 dated February 8 and June 15, 1982. The revised requirements, in part, stated that the overtime limits must be included in the technical specifications. Rather than unnecessarily clutter our tech specs, we met the requirements for limiting overtime by making changes to our administrative procedures. As stated in our March 19, 1984 letter to the NRC, we feel that this item is not appropriate for the tech specs. Since we have incorporated the NRC's guidance on staff overtime and working hours in our administrative procedures, and we are required by the tech specs to operate the plant in accordance with approved procedures, we are in compliance with the requirements of this item.

We are currently awaiting NRC approval of our proposal to delay amending our operating license and revising our technical specifications in anticipation of the adoption of the Commission's proposed rule on technical specification content. This proposed rule, as published in 47 Federal Register 13369, is an attempt to reduce the paperwork burden for both licensees and the NRC staff due to the large number of proposed change requests that must be processed.

I.A.1.3.2 Shift Manning-Minimum Shift Crew

As stated in Generic Letter 83-37 dated November 1, 1983, Item I.A.1.3 has been superceded by rule 10 CFR 50.54(m), shift manning. Compliance with the rule was originally required for January 1, 1984. Reference 182 requested an extension of the requirement to January 1, 1987 and requested two exemptions to the rule. A meeting was held on January 10, 1984 to discuss our requests. There, we agreed to drop the two exemption requests and to modify our request for extension. By letter to the NRC dated February 14, 1984, WE requested that an extension until March 1, 1985 for compliance with the rule be granted. Since this item is superceded by rule 10 CFR 50.54(m), we consider it to be closed with respect to the TMI Action Plan.

I.C.1 Short-Term Accident and Procedures Review

The program to achieve compliance with NUREG-0737, Item I.C.1, was presented to the NRC in a meeting held on June 18, 1981, and submitted to the NRC by Owners Group letter, OG-61, dated July 7, 1981, R. W. Jurgensen to S. H. Hanauer (Reference 36). The previous program submittal to the NRC (Reference 20) resulted in several basic concerns which could not be easily resolved within the scope of the material submitted. These NRC concerns and the need to better organize the set of emergency procedures resulted in a new configuration which was presented to the NRC at the June 18, 1981 meeting. The new procedure set, referred to as Emergency Response Guidelines (ERGs), was transmitted to the NRC by Owners Group letter, OG-64, dated November 11, 1981 (Reference 53). Representatives of the Westinghouse Owners Group met with the NRC on February 9, 1982 to discuss the submitted ERGs. A summary of the meeting is presented in Reference 64.

Additionally, the WOG has submitted descriptions of the ERG program in letters dated July 21, 1982 and January 4, 1983. The ERG program was reviewed by the NRC. NRC Generic Letter 83-22 dated June 3, 1983 transmitted the Safety Evaluation of the ERG's and approved them for implementation.

We are using Revision 1 of the ERG's to upgrade our Emergency Operating Procedures. Revision 1 was issued to WOG members on November 16, 1983. Our letter of March 30, 1984 provided the current upgraded EOP implementation schedule. Our letter dated June 1, 1984 provided the Procedures Generation Package for the development of the new EOP's. We expect final EOP implementation to take place in January 1985.

I.D.1 Control Room Design Review

Our previous commitments for this item were covered in our first two responses to Supplement I to NUREG-0737 (Generic Letter 82-33 dated December 17, 1982). Those two letters were dated April 15 and August 24, 1983. However, we recently revised our commitments in a letter to the NRC dated May 3, 1984. In that letter we stated that the program plan for the control room design review would be submitted to the NRC by July 31, 1984. The final report of the design review will be submitted in October 1985.

I.D.2 Plant Safety Parameter Display Console

Wisconsin Electric has undertaken two projects relating to the Safety Parameter Display System (SPDS). The first project was a joint effort with eleven other utilities and Quadrex Corporation to design and demonstrate a Safety Assessment System (SAS), our version of the SPDS. This demonstration SAS project was completed on May 20, 1982. In parallel with the SAS project, WE developed a specification for a new plant process computer system which would integrate the requirements of the SPDS, some aspects of Regulatory Guide 1.97 instrumentation, and emergency response facility plant data requirements. The SAS was made part of the new plant process computer. In September 1981 we signed a contract with Electronic Associates, Inc. (EAI) for a Safety Assessment System and Plant Process Computer System. In accordance with our March 8, 1984 submittal on the current computer installation schedule, we expect to have the SAS operational by December 31, 1985 if the computer system is delivered in June of 1985.

II.B.1 Reactor Coolant System Vents

This item has been superseded by 10 CFR 50.44 (c)(3)(iii). NRC letter to Mr. C. W. Fay dated September 22, 1983 provided the Safety Evaluation for our Reactor Coolant System Gas Vent System (RCS GVS) and closed this item from a NUREG-0737 standpoint.

The current status of our RCS GVS is as stated in our letter to the NRC dated November 29, 1983. The piping and valving for the RCS GVS have been installed and hydrostatically tested in both Point Beach units. Using interim power supplies and an interim control panel, the RCS GVS may be remotely operated from the cable spreading room of the control building for both units, with the exception of the Unit 2 remote vent to containment. The valve for this vent path did not pass the leakage test; the valve was removed

and the line was capped. The valve was returned to the vendor for rework and testing. It is scheduled to be replaced during the next Unit 2 refueling outage scheduled for fall 1984. Final completion and full operation of the RCS GVS is also dependent upon delivery, installation, and startup of the Auxiliary Safety Instrumentation Panels (ASIPs) where the final controls will be located and the upgraded permanent power supplies as well as the upgrading of Emergency Operating Procedures addressed by Item I.C.1. It is expected that these items will be complete in December 1984. Also, the upgraded EOP's which will address the RCS GVS will be implemented in January 1985. By letter dated December 30, 1983, the NRC granted an exemption from the schedule requirements of 10 CFR 50.44 (c)(3)(iii) until December 31, 1984.

II.B.2 Plant Shielding

We have completed the requirements for item II.B.2-Plant Shielding. Subitem II.B.2.2-Plant Shielding Modifications for Vital Area Access was closed by the NRC's Safety Evaluation dated November 3, 1983. Subitem II.B.2.3-Radiation Qualification of Safety-Related Equipment is also complete. Both items were listed as closed in Inspection Reports No. 266/83-26 and No. 301/83-24 dated February 22, 1984.

II.B.3 Post Accident Sampling

The final Safety Evaluation for the Point Beach Post Accident Sampling System (PASS), transmitted by letter dated November 3, 1983, stated that Item II.B.3 was considered complete for our plant and that any further action associated with the PASS would be handled on a plant specific basis.

The remaining action pertaining to this item is the incorporation of a revised core damage assessment methodology in our Emergency Plan Implementing Procedures (EPIP's). This methodology was developed by Westinghouse for the Westinghouse Owner's Group (WOG) and was submitted to the NRC by letter OG-116 dated February 29, 1984. Revision 1 to the methodology was submitted by letter OG-118 dated March 23, 1984. The NRC SER dated April 10, 1984, provided the approval of Revision 1. We received the SER via WOG letter WOG-84-172 dated May 2, 1984. We are using Revision 1 for our EPIP's.

Also, in Reference 103, we committed to environmentally qualify the electrical components for the instrument air containment isolation and residual heat removal sample valves to enhance post accident sampling capability. Unit 1 is complete and Unit 2 will be done by November 1, 1984.

II.D.1.2 Relief and Safety Valve Test Requirements

In Reference 117, we committed to implement several modifications to improve the capability of piping and supports to accommodate the calculated valve actuation loads during transient conditions. These modifications were completed during the Spring 1983 refueling and steam generator sleeving outage for Unit 2 and during the Fall 1983 refueling and steam generator replacement outage for Unit 1. The completion of these modifications fulfills the requirements of this item. Our final response to this item was dated May 17, 1984. The NRC's Confirmatory Letter of July 12, 1983 lists this item as complete. Although we have received no safety evaluation, we consider this item closed.

II.D.1.3 Block Valve Testing

Our letter to the NRC dated August 9, 1982 was our final submittal concerning block valve testing. In this letter we concluded that the EPRI/Marshall Electric Motor Operated Valve (block valve) Interim Test Data Report dated May 31, 1982 fulfilled the NUREG-0737 requirements to provide test evidence to verify that block valves installed at Point Beach Nuclear Plant will function properly over the range of expected operating and accident conditions. The confirmatory letter from the NRC dated July 12, 1983 listed this item as complete.

II.D.3.1 Direct Indication of Relief and Safety Valve Position

Adapters and Lift Indicating Switch Assemblies (LISA's) will be mounted on the pressurizer safety valves to provide direct indication of valve position. The assemblies have been purchased and received from Crosby for use on Crosby valves. These switch assemblies use magnetically operated reed switches to provide separately powered and redundant, open, midpoint and closed indications. These position indications will be provided for each of the 2 valves for each unit in the control room on the ASIPs.

The lift indicating switch assemblies are not presently qualified but Crosby is expected to qualify the assemblies. The reason the lift indicating switch assemblies will be installed is that they provide position indication based directly on valve position and are easier to environmentally qualify than the presently installed acoustic monitoring system. The presently installed acoustic monitoring system will continue to be used until the new assemblies are installed.

Paragraph (g) of NRC rule 10 CFR 50.49 imposed an environmental qualification deadline for this equipment of "by the end of the second refueling outage after March 31, 1982" (i.e., June 30, 1983 for Unit 2 and March 30, 1984 for Unit 1). However, due to Crosby's test difficulties in the initial qualification program, we were unable to meet this deadline. We requested and were granted an extension of the environmental qualification deadline until May 24, 1985. This date is the end of the next scheduled refueling outage for PBNP, Unit 1. This assumes that the Crosby qualification tests will be satisfactorily completed in time to enable us to install the LISAs on Unit 2 during the fall refueling outage scheduled to start on September 28, 1984.

II.E.1.1 Auxiliary Feedwater System Evaluation

The NRC issued the final Safety Evaluation for this item by letter dated April 21, 1982. It stated that upon submittal of proposed Technical Specification modifications to resolve short term recommendation GS-1, this item would be resolved. Additionally, in response to concerns relating to this item, we had committed to installing separate, redundant level instrumentation for both condensate storage tanks. We also committed to installing a safety grade automatic auxiliary feedwater pump trip on low suction pressure as would occur in the event of failure of the condensate storage tanks.

The Technical Specification modifications requested in the NRC's safety evaluation were submitted by letter dated April 27, 1982 and approved in the NRC's letter dated July 27, 1982. Also, the separate, redundant level

instrumentation for both condensate storage tanks has been installed and is operational.

The AFW pump low suction pressure trip is the only outstanding commitment we made in response to this item. Currently, the pressure transmitters for the low suction pressure trip are installed, the Foxboro Spec 200 circuitry is in place, and the trip circuitry is being designed by WE personnel.

II.E.1.2 Auxiliary Feedwater System Initiation and Flow

The NRC issued the Safety Evaluation for this item by letter dated May 3, 1982. Contingent upon the completion of some circuitry modifications and changes to the Point Beach Technical Specifications, this item was considered resolved. These modifications were necessary, in part, to ensure that operators are alerted when the motor driven AFW pump automatic initiation circuitry is bypassed due to placing a main feedwater pump control switch in the "pull-out" position. Modifications were also required in order to provide indication when the motor-driven pump was out of service due to placing its control switch in the "pull-out" position. Additionally, the AFW flow indication power supplies required upgrading to a battery-backed, class 1E source. We also committed to revising the Point Beach Technical Specifications to include periodic testing of the AFW system automatic actuation logic and to revising the test procedure to verify proper operation of the relay coil/contact combination used to initiate AFW on steam generator low-level. These modifications have been made, the Technical Specifications have been changed, and the test procedure has been revised as we committed. We therefore consider this item closed.

A related commitment, not in response to this item but in response to NRC concerns on AFW system operability, was made in a letter to the NRC dated June 20, 1983. In that letter we committed to modify the opening circuitry for the motor-operated discharge valves for the motor-operated AFW pumps. This modification will ensure that the affected unit's valve will automatically open on automatic initiation of the AFW system should the valve be closed due to testing, startup of the unit, etc. (The valves are normally full open.) This modification was completed on June 29, 1984.

II.E.4.2 1/4 Containment Isolation Dependability-Improved Diverse Isolation

As originally designed, Point Beach met the NRC criteria for diversity of isolation and manual, single valve restoration (Reference 3: NUREG-0578, Item 2.1.4, LL Cat. A). Two out of three areas of NRC concern have been previously completed. These were revisions to administrative and operating procedures and modification to the remote control switch for outboard purge valve CV-3212 (Reference 2).

The remaining item was the addition of isolation valves inside containment to piping for letdown, seal water return, and steam generator blow-down. The installation of these inside containment isolation valves was completed for Unit 2 during the spring 1983 refueling and steam generator sleeving outage and for Unit 1 during the fall 1983 refueling and steam generator replacement outage. Since the NRC's Confirmatory Order dated July 12, 1983 lists this item as complete, and our action in response to this item is complete, we consider it closed.

II.F.1 Accident Monitoring

A description of our accident monitoring systems was provided in our submittals to the NRC dated April 26 and July 20, 1982. Currently, all instruments addressed under this item as described in our previous submittals, are installed, calibrated, and operational using interim power supplies. The instruments will be connected to their final power supplies when the instrument bus upgrade is completed and the Auxiliary Safety Instrumentation Panels (ASIPs) are installed and operational. Additionally, the final display configuration of the accident monitors addressed by items II.F.1.3 through II.F.1.6 will not be completed until the ASIPs are completed. In accordance with our June 26, 1984 letter, we currently expect to have the ASIPs installed and tested by October 31, 1984 and the instruments integrated into procedures and operator training on the procedures complete by January 31, 1985.

By letter dated June 21, 1983, the NRC issued its Safety Evaluation for the Containment Pressure Monitoring System (II.F.1.4), Containment Water Level Monitor System (II.F.1.5), and Containment Hydrogen Monitor System (II.F.1.6). The letter stated that these items were resolved for Point Beach. Although the review of these items did not address environmental qualification, this topic is being addressed in accordance with 10 CFR 50.49.

II.F.2.1 Instrumentation for Detection of Inadequate Core Cooling/Subcooling Meter

The final subcooling indication system which will meet all of the NRC requirements has been designed as part of the qualified instrumentation system being added to the plant. This added system is intended to provide the means by which the large number of instrumentation changes can be properly incorporated into the existing plant. This new system consists of redundant channels of instrumentation for each unit. The ASIP will be located in the control room at a location which allows for easy viewing of the panel-mounted display devices. Subcooling display meters will be located on the ASIP. The operability of the final subcooling meter is dependent upon the delivery, installation and operational checkout of the new racks and panels.

Currently, one of two subcooling monitor channels from each unit is connected to a subcooling display temporarily located in an auxiliary rack in the computer room. The second channel from each unit is connected to the backup computer with continuous CRT display available in the control room. Additionally, due to the past delays in the design and delivery of the new plant process computer system, we have decided to purchase the equipment necessary to make the subcooling indication system fully operational without the new computer. This equipment will be in a configuration which will allow it to be either an interim or a final subcooling indication system. The final configuration will be determined at a later date. We expect the system to be fully operational in late 1984.

II.F.2.3 Reactor Vessel Water Level

Wisconsin Electric submittals dated October 20, 1981, July 28, 1982, January 19, 1983 and March 21, 1983 provided detailed descriptions, answers to NRC questions, and analyses on our Reactor Vessel Water Level system (RVWLS). Currently, all connections for the RVWLS have been made up through the Foxboro

racks. We have one channel of uncompensated level from each unit connected to the backup computer with continuous display available in the control room. Uncompensated level will become available on the ASIPs when they become operational in late 1984. compensated level will become available when the new equipment noted in Note II.F.2.1 is installed in late 1984.

II.K.3.5 Automatic Trip of Reactor Coolant Pumps During Loss-of-Coolant Accident

The criteria for resolution of this item were established in Generic Letter 83-10d dated February 8, 1983. Reference 143 presented our plan for demonstrating compliance with those criteria. To summarize this plan, Westinghouse and the Westinghouse Owner's Group (WOG) undertook a two part program to address the requirements of Generic Letters 83-10c and d. In the first part of the program, revised RCP trip criteria were developed to provide an indication to the operator to trip the RCP's for small break LOCA's requiring such action while allowing continued RCP operation for steam generator tube ruptures, less than or equal to a double-ended tube rupture. The revised RCP trip criteria were incorporated into Revision 1 of the Emergency Response Guidelines. Part Two of the program provided the required justification for manual RCP trip. WOG letter OG-110 dated 12/1/83 transmitted WOG report "Evaluation of Alternate RCP Trip Criteria" which presented the criteria and methodology for RCP trip in response to Section I of Generic Letter 83-10d. WOG letter OG-117 dated 3/12/84 transmitted the WOG report "Justification of Manual RCP Trip for SBLOCA Events." Our final response to this item was submitted by letter dated May 1, 1984.

II.K.3.30/31 Small Break LOCA Methods/Compliance With 10 CFR 50.46

The most recent correspondence on these two items was NRC Generic Letter 83-35 dated November 2, 1983. It stated that the requirements of Item II.K.3.31 for our currently approved Small Break LOCA model can be satisfied by our submittal of a plant-specific analysis which demonstrates that current SBLOCA analyses using previously approved evaluation methods are more limiting than analyses using revised II.K.3.30 models. This can be done on a generic basis through an owner's group with the results submitted individually by the licensee. Westinghouse has submitted a revised SBLOCA model for NRC approval. Wisconsin Electric, as part of the Westinghouse Owners Group, is waiting for the NRC Safety Evaluation of this model before proceeding any further towards the completion of either of these items.

III.A.1.2 Upgrading Emergency Support Facilities

The status of our emergency response facilities is described in our submittals dated March 8, 1984 and April 15 and August 24, 1983. These submittals were in response to Generic Letter 82-33, "Supplement 1 to NUREG-0737 Requirements for Emergency Response Capability."

To summarize, we have completed the construction of the Technical Support Center (TSC), the Operational Support Center (OSC), and the Site Boundary Control Center (SBCC). (The Emergency Operations Facility, EOF, is located in the SBCC.) However, since the final TSC and EOF instrumentation displays are an integral part of the new plant process computer output

display system, final operability of the TSC and EOF is dependent upon the computer installation schedule. Additionally, the permanent emergency power supply to the TSC is still expected to be complete by 12/31/84. The current plant parameters displayed in the TSC are as described in our submittals dated March 8, 1984 and March 14, 1980.

III.A.2.2 Emergency Preparedness-Meteorological Data

References 13, 38, and 56 provide a description of our Meteorological and Dose Assessment system. Our March 8, 1984 letter provides the current status and schedule for completion. To summarize, both the primary and backup towers are complete. The lake breeze effects tower is expected to be complete by the end of October 1984. Software development for the Meteorological and Dose Assessment program is essentially complete except for integration and checkout on the new computer. The final Meteorological and Dose Assessment system will not be completed until the new computer system is installed.

III.D.3.4 Control Room Habitability

NRC letter dated August 10, 1982 transmitted the Safety Evaluation Report for this item. The SER concluded that the item was resolved for PBNP. That conclusion was based upon commitments made by members of our staff to complete modifications and recommendations as identified in the SER. The commitments included the addition of portable shielding at the control room doors and windows, the provision of additional self-contained breathing apparatus units in the control room, and the provision for detection capabilities for radioactive iodine and noble gases in the control room HVAC air supply duct. These commitments have been completed. We therefore consider this item closed.

SCHEDULE TABLE
POST-TMI REQUIREMENTS FOR OPERATING REACTORS

Clarifi- cation Item	Shortened Title	Description	NRC Implemen- tation Schedule	PBNP Applica- bility	PBNP Schedule	Remarks	Rev
I.A.1.1	Shift Technical Advisor	1. On duty	Closed (59)	Yes	Completed	On duty since 1/1/80 - Reference 1, 12a, 25a, and 59	3
		2. Tech Specs	Closed (50a)	Yes	Completed	Reference 12a, 15, 25a, 50a, and 59	2
		3. Trained per LL Cat B	Closed (59)	Yes	Completed	Note I.A.1.1.3 and Reference 25a	
		4. Describe long-term program	Closed (59)	Yes	Completed	Reference 17, 59, and 184	
I.A.1.2	Shift Supervisor Responsibilities	Delegate non-safety duties	Closed (25a)	Yes	Completed	References 1, 25a, and 44a	3
I.A.1.3	Shift Manning	1. Limit overtime	11/1/80	Yes	Completed	Note I.A.1.3, PBNP Approved Procedure 4.3, Operations Division Personnel Assignments and Scheduling, Rev. 0, and References 25a, 44a, 54, 60 and 83	4
		2. Min. Shift Crew	Superceded by 10CFR50.54(m)	Yes	3/1/85	Note I.A.1.3 References 4b, 7, 54, 62, 66, 70, 79, 99, 182, 187 and 209	4
I.A.2.1	Immediate Upgrading of RO and SRO Training and Qualifications	1. SRO Experience	Closed (25a)	Yes	Completed		
		2. SROs be ROs 1 yr.	Closed (25a)	Yes	Completed		2
		3. Three mo. training on shift	Closed (25a)	Yes	Completed	Note I.A.2.1.1/4 and Reference 9a	
		4. Modify training	Closed (108)	Yes	Completed	References 25a and 108	3
		5. Facility Certification	Closed (25a)	Yes	Completed	Note I.A.2.1.5	
I.A.2.3	Administration of Training Programs	Instructors Complete SRO Exam	8/1/80	Yes	Completed	Note I.A.2.3	
I.A.3.1	Revise Scope and Criteria for Licensing Exams	1. Increase scope	5/1/80	Yes	Completed		
		2. Increase passing grade	5/1/80	Yes	Completed		
		3. Simulator exam	6/1/80	N.A.	---	Note I.A.3.1.3 and Reference 68	3

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Clarification Item	Shortened Title	Description	NRC Implementation Schedule	PBNP Applicability	PBNP Schedule	Remarks	Rev.
I.C.1	Short-Term Accident and Procedures Review	1. SB LOCA	Closed (25a)	Yes	Completed	Reference 25a	3
		2. Inadequate Core Cooling					
		a. Reanalyze and propose guidelines	1/1/81	Yes	Completed	Generic procedures already submitted to NRC - Reference 36, 53, and 64	3
		b. Revise procedures	TBD	Yes	1/31/85	Note I.C.1 and References 114, 135a, 143a, 144, 154, 155, 175, 181a, 186a, 216, 221, and 227	4
		3. Transients and accidents					
		a. Reanalyze and propose guidelines	1/1/81	Yes	Completed	Same as I.C.1.2.a	3
		b. Revise procedures	TBD	Yes	1/31/85	Note I.C.1 and same references as I.C.1.2.b above	4
I.C.2	Shift and Relief Turnover Procedures	Implement shift turnover checklist	Closed (25a)	Yes	Completed	References 9b and 25a	3
I.C.3	Shift-Supervisor Responsibility	Clearly define superv and oper responsibilities	Closed (25a)	Yes	Completed	Reference 25a	3
I.C.4	Control-Room Access	Establish authority limit access	Closed (25a)	Yes	Completed	References 9b and 25a	3
I.C.5	Feedback of Operating	Licensee to implement procedures	Closed (54)	Yes	Completed	PBNP Administrative Procedure 3.15.7, Rev. 0, approved 12/19/80, "Procedure for Feedback of Operating Experience to Plant Staff" and References 25a and 54	3
I.C.6	Verify Correct Performance of Operating Activities	Revise performance procedures	Closed (54)	Yes	Completed	PBNP Administrative Procedure 4.13, Rev. 9, effective 6/20/80, "Equipment Isolation Procedure" and References 25a and 54	3
I.D.1	Control Room Design Reviews	Preliminary assessment and schedule for correcting deficiencies	TBD	Yes	10/85	Note I.D.1 and References 114, 144, 175 and 225	4

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Clarification Item	Shortened Title	Description	NRC Implementation Schedule	PBNP Applicability	PBNP Schedule	Remarks	Rev
I.D.2	Plant Safety Parameter Display Console	1. Description	TBD	Yes	Completed 12/31/85* (Projected) 12/31/85* (Projected)	Note I.D.2	3
		2. Installed	TBD	Yes			4
		3. Fully implemented	TBD	Yes		References 114, 144, 175, and 215	4
II.B.1	Reactor Coolant System Vents	1. Design vents	Note II.B.1	Yes	Completed 12/31/84+ 1/31/85	References 25a and 47 Note II.B.1, and references 84a, 105, 113, 121, 142, 148, 181, 185, 196 and 202 References 181, 185, 196	3
		2. Install vents (LL Cat B)	Note II.B.1	Yes			4
		3. Procedures	Note II.B.1	Yes			
II.B.2	Plant Shielding	1. Review designs	Closed (190)	Yes	Completed Completed Completed	Reference 25a and 50 Note II.B.2.2 and References 25a, 47, 68, 89, 98, 136 and 190 Note II.B.2.3 and References 68 and 210	3
		2. Plant modifications (LL Cat B)	Closed (190)	Yes			4
		3. Equipment qualification	Closed (210)	Yes			4
II.B.3	Post Accident Sampling	1. Interim system	Closed (189)	Yes	Completed Completed	Reference 25a and 50 Note II.B.3 and References 29, 68, 86, 98, 103, 116, 131, 156, 171, 189, 197, 219, and 224	
		2. Plant modifications (LL Cat B)	Closed (189)	Yes			4
II.B.4	Training for Mitigating Core Damage	1. Develop training program	Closed (108)	Yes	Completed Completed Completed	Reference 108 References 23, 47, 68, and 108	1
		2. Implement program					
		a. initial	Closed (108)	Yes			3
II.D.1	Relief : Safety Valve Test Requirements	b. Complete	Closed (108)	Yes			
		1. Submit program	1/1/80	Yes	Completed	References 10a and 50	3
		2. RV and SV Testing (LL Cat B)					
		a. Complete testing	4/1/82	Yes	Completed Completed	References 50 and 71 References 50, 71, 87, 117, 170, and 226	4
		b. Plant-specific report	7/1/82	Yes			4
		3. Block-Valve testing	7/1/82	Yes	N.A.	Note II.D.1.3 and References 92, 170, and 226	4

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Clarification Item	Shortened Title	Description	NRC Implementation Schedule	PBNP Applicability	PBNP Schedule	Remarks	Rev.
II.D.3	Valve Position Indication	1. Install direct indications of valve position	Closed (25a)	Yes	Completed	Note II.D.3.1 and References 9b and 25a	4
		2. Tech Specs	Closed (25a)	Yes	Completed	References 15, 25a and 50a	1
II.E.1.1	Auxiliary Feedwater System Evaluation	1. Short term 2. Long term	Closed (74a) Closed (74a)	Yes Yes	Completed Completed	Note II.E.1.1 and References 40, 49, 67, and 74a	4
II.E.1.2	Auxiliary Feedwater System Initiation and Flow	1. Initiation					
		a. Control grade	Closed (25a)	Yes	N.A. Original Plant Design	Reference 25a	4
		b. Safety grade	Closed (25a)	Yes		References 1, 2, 3, 12a, 25a and 76	4
		2. Flow Indication					
		a. Control grade	Closed (76, 199a)	Yes	Completed	Reference 25a, 76 and 200	4
		b. LL A Tech Specs	Closed (76, 199a)	Yes	Completed	Reference 12a, 15, 76 and 200	4
II.E.3.1	Emergency Power for Pressurizer Heaters	c. Safety grade	Closed (76, 199a)	Yes	Completed	References 44a, 68, 76 and 200	4
II.E.4.1	Dedicated Hydrogen Penetrations	1. Upgrade power	Closed (25a)	Yes	Original Plant Design Completed	References 1, 2, 3, 12a, and 25a	3
		2. Tech Specs	Closed (50a)	Yes		Reference 15 and 50a	1
II.E.4.2	Containment Isolation Dependability	1. Design	Closed (48)	Yes	Original Plant Design N.A.	References 1, 2, 3, 25a and 48	3
		2. Install	Closed (48)	Yes			
II.E.4.2	Containment Isolation Dependability	1-4. Imp. diverse isolation	1/1/80	Yes	Completed	Note II.E.4.2.1/4 and Reference 44a, & 75	4
		5. Contmt pressure setpoint					
		a. Specify pressure	Closed (42)	Yes	Completed	References 26, 42, 44a and 68	3
		b. Modifications	Closed (170)	Yes	N.A.	Reference 170	
		6. Contmt purge valves	Closed (25a)	Yes	Completed	Administratively closed - References 25a, 44a and 45	3

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Clarification Item	Shortened Title	Description	NRC Implementation Schedule	PBNP Applicability	PBNP Schedule	Remarks	Rev.
II.K.2	Orders on B&W Plants	13. Thermal-mechanical report	Closed (230)	Yes	Completed	References 58 and 228	3
		14. Lift frequency of PORVs and SVs	See II.K.3.7				
		15. Effects of slug flow on OTSGS	Completed	N.A.	---		
		16. RCP seal damage	Completed	N.A.	---		
		17. Voiding in RCS	Closed (205)	Yes	Completed	Note II.K.2.17 and References 25b, 53 139, 140, and 205	3
		19. Benchmark analysis of seq. AFW flow	a. Closed (34)	Eliminated	N.A.	Reference 34	
		20. System response to SB LOCA	Complete	N.A.	---		
II.K.3	Final recommendations, PWR Task Force	1. Auto PORV isolation					
		a. Design	Closed (180)	Yes	N.R.		
		b. Test/install	Closed (180)	Yes	N.R.	Note II.K.3.1 and References 4, 44a, & 180	3
		2. Report on PORV failures	Closed (180)	Yes	Completed	Note II.K.3.2 and Reference 19 and 180	3
		3. Reporting SV and RV failures and challenges	Closed (69)	Yes	Completed	Note II.K.3.3 and Reference 69	3
		5. Auto trip on RCPS					
		a. Propose modifications	7/1/81	Yes	Completed	Note II.K.3.5 and Reference 31, 126, 141, 143, 196a, 199, 216, and 223	4
		b. Modify	3/1/82	Yes	1/31/85	Note II.K.3.5	
		7. Eval of PORV opening probability	1/1/81	N.A.	---		
		9. PID controller	Closed (43)	Yes	Completed	Controller change made upon initial notification by vendor prior to TMI-2 (References 4, 25a, and 43)	3
		10. Proposed anticipatory trip modifications	Closed (43)	Yes	Original Plant Design	References 4 and 43	

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<u>Clarification Item</u>	<u>Shortened Title</u>	<u>Description</u>	<u>NRC Implementation Schedule</u>	<u>PBNP Applicability</u>	<u>PBNP Schedule</u>	<u>Remarks</u>	<u>Rev</u>
II.K.3 (Continued)	Final Recommendations, B&O Task Force	11. Justify use of certain PORV	Plant specific	Yes	N.A.	As part of the original Plant design (different from TMI-2), Point Beach has Copes-Vulcan PORVs which corresponds to the Westinghouse data base, and, thus, no justification is needed.	
		12. Anticipatory trip on turbine trip					
		a. Confirmation or proposed modifications	Closed (43)	Yes	Original Plant Design	Reactor trip caused by turbine trip bypassed below 50% power as detected by the power range detectors. (References 43 and 44a)	3
		b. Modify	Closed (43)	N.A.	---		
		13. HPCI & RCIC init levels					
		a. Analysis	1/1/81	N.A.	---		
		b. Modify	7/1/81	N.A.	---		
		14. Iso condenser isol modification	1/1/82	N.A.	---		
		15. Isolation of HPCI and RCIC modification	7/1/81	N.A.	---		
		16. Challenges and failures to relief valves					
		a. Study	4/1/81	N.A.	---		
		b. Modify	1st refueling or 1 yr after approval	N.A.	---		
		17. ECCS system outages	Closed (174)	Yes	Completed	Note II.K.3.17 and Reference 23, and 174	1,2

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Clarification Item	Shortened Title	Description	NRC Implementation Schedule	PBNP Applicability	PBNP Schedule	Remarks	Re
II.K.3 (Continued)	Final Recommendations, B&O Task Force	31. Compliance with CFR 50.46	1/1/83 or 1 yr after staff approval	Yes	TBD	Note II.K.3.31 and Reference 188	
		40. RCP seal damage	See II.K.2.16	N.A.	---		
		43. Effects of slug flow	See II.K.2.15	N.A.	---		
		45. Manual depressurization	1/1/83	N.A.	---		
		46. Michelson concerns	Completed	N.A.	---		
		57. Manual act of ADS	TBD	N.A.	---		
III.A.1.1	Emergency Preparedness, Short Term	Short-term improvements	Completed	Yes	Completed		
III.A.1.2	Upgrade Emergency Support Facilities	1. Interim TSC, OSC and EOF	Closed (25a)	Yes	Completed	References 9b and 25a	
		2. Design	Reference 15b	Yes	Completed	Reference 28	
		3. Modifications	Reference 15b	Yes	12/31/85* (Projected)	Note III.A.1.2 and References 13, 28, 38, 56, 80, 88, 94, 101, 112, 114, 151, 157, 158, 163, 175, 178, 186, 194, and 215	
III.A.2	Emergency Preparedness	1. Upgrade emergency plans to App. E, 10 CFR 50	Closed (149)	Yes	Completed	Note III.A.2.1 and Reference 12b, 17a, 55, and 149	
		2. Meteorological data	6/1/83	Yes	12/31/85* (Projected)	Note III.A.2.2 - References 13, 28, 38, 56, 114, 144, 175, and 215	
III.D.1.1	Primary Coolant Outside Containment	1. Leak reduction	Closed	Yes	Completed	Currently changing to a yearly testing schedule for both units coincident with refueling outages (References 1, 2, 3, and 25a)	
		2. Tech Specs	12/15/80	Yes	Completed	Reference 15	
III.D.3.3	Inplant Iodine Monitoring	1. Provides means to determine presence of radioiodine	Closed (25a, 63)	Yes	Completed	References 12a and 25a	

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Clarification Item	Shortened Title	Description	NRC Implementation Schedule	PBNP Applicability	PBNP Schedule	Remarks	Rev
II.K.3 (Continued)	Final Recommendations, B&O Task Force	18. ADS actuation a. Study b. Propose mods c. Modification	4/1/81 4/1/82 1st refuel 6 mo after staff approval	N.A. N.A. N.A.	--- --- ---		
		19. Interlock recirc pump modification	7/1/81	N.A.	---		
		20. Loss of SVC	7/1/81	N.A.	---		
		21. Restart of CCS and LPCI a. Design b. Modification	1/1/81 1st refueling 60 mo after staff approval	N.A. N.A.	--- ---		
		22. RCIC suction a. Verify procedures b. Modification	1/1/81 1/1/82	N.A. N.A.	--- ---		
		24. Space cooling for HPCI/RCIC modifications	1/1/82	N.A.	---		
		25. Power on pump seals a. Propose mods b. Modification	Closed (124) Closed (124)	Yes Yes	None N.A.		
		27. Com ref. level	7/1/81	N.A.	---	Note II.K.3.25 and References 106, 119 & 124	3
		28. Qual of ADS accumulators	1/1/82	N.A.	---		
		29. Performance of isolation condensers	4/1/81	N.A.	---		
		30. SB LOCA methods a. Schedule outline b. Model c. New analyses	11/15/80 1/1/82 1/1/83 or 1 yr after staff approval	Yes Yes Yes	TBD TBD TBD	Note II.K.3.30 and References 69a, 91 & 188	4

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<u>Clarification Item</u>	<u>Shortened Title</u>	<u>Description</u>	<u>NRC Implementation Schedule</u>	<u>PBNP Applicability</u>	<u>PBNP Schedule</u>	<u>Remarks</u>	<u>Rev</u>
III.D.3.4	Control Room Habitability	2. Modifications to accurately measure I_2	Closed (63)	Yes	Completed	Note III.D.3.3 - Reference 12a, 25a, and 63	3
		1. Review	Closed (93)	Yes	Completed	Note III.D.3.4 and References 12, 13, 16, 93 and 136	
		2. Modification	Closed (93)	Yes	Completed	Note III.D.3.4 and References 12, 13, 16, 93, 4 136 and 210	

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