



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

July 20, 1984

Mr. R. L. Spessard, Director
Division of Engineering, Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Spessard:

PRINCIPAL STAFF			
RA		DRP	
D/RA		DRS	
RC		DRSS	
PAO		ML	
SGA		OL	
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DOCKET NOS. 50-266 & 50-301
FURTHER RESPONSE TO SPECIAL INSPECTION OF QA PROGRAM
POINT BEACH NUCLEAR PLANT

Your letter dated May 17, 1984, acknowledged our letters dated March 21 and April 2, 1984, which listed the steps we are taking to correct the noncompliances identified in Inspection Report 50-266/83-21 and 50-301/83-20. Although our responses were characterized as generally comprehensive in nature, you noted that the responses to several of the violations required clarification. Accordingly we are providing the following information in response to your request:

Violation 1.a

Describe the method which assures that only controlled drawings representing current configuration will be used for maintenance and modification work and the interim measures that have been taken to assure that uncontrolled drawings are not being used for those purposes.

Effective on and after June 1, 1984, drawings received at the Point Beach Nuclear Plant are being stamped with the identification "For Information Only", unless the drawings are received as updates for a controlled set of drawings. A review of all controlled sets of drawings was completed to ensure that these sets are properly identified. Supervisory attention has been directed to ensuring that work requiring the use of drawings is accomplished using only the controlled materials. We believe that the actions outlined above meet or exceed the requirements of 10 CFR 50, Appendix B. Full compliance with these measures was achieved on July 1, 1984.

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Violation 2.c - Describe the training conducted or planned to prevent such oversights by supervisory personnel in the future and implementation dates for completion of the necessary program changes.

Violation 2.e - Provide completion and implementation dates for the necessary program changes.

These violations addressed inadequacies in the use and availability of maintenance procedures. As stated in the initial response, the development of a governing administrative procedure which addresses the writing and use of maintenance instructions is scheduled to be completed by August 31, 1984. The development of this procedure continues to include a review of the existing maintenance request procedure to determine the type of instruction which should be included on the maintenance request. Once the governing procedure has been written and approved, specific maintenance instructions will be developed utilizing the guidance of that basic procedure. As these specific instructions are completed, appropriate maintenance department training will be accomplished to familiarize personnel with the new instructions and to prevent future oversights such as those described in the violation. Although this process will be a continuous one in that additional maintenance instructions will be written as the need dictates, the initial basic program implementation including the requisite training will be completed by August 31, 1985. In the interim, the circumstances of the specific oversight mentioned in the violation 2.c have been discussed with maintenance supervisory personnel to make them aware of the NRC concerns in this matter and thereby preclude such oversights during the development of our program.

Violation 5.a - Specify when you will be in compliance.

Violation 5.c - Your response does not address the violation. Clarify when and how audits will be performed and the results of actions taken to correct deficiencies, as required by the technical specifications.

The Wisconsin Electric Quality Assurance Section has been assigned the responsibility for performing audits which encompass conformance of the Point Beach facility operation with the provisions contained in the Technical Specifications and the results of action taken to correct deficiencies. These audits will be performed under the cognizance of the Offsite Review Committee (OSRC), and the results of the audits will be reviewed by that Committee. The Quality Assurance Section has developed a written plan for performance of these Technical Specification related audits.

This plan was endorsed by the OSRC at their meeting on May 14, 1984. Initial audits conducted in accordance with this plan will be completed prior to and reviewed at the next meeting of the OSRC scheduled for November 1984. At that time compliance with these requirements will be achieved.

Violation 6.a - Clarify how you assure that the audits of all 18 criteria of 10 CFR 50 Appendix B and the audits required by the technical specifications are performed under the guidance of a certified lead auditor.

As discussed above, the audits performed in satisfaction of the Technical Specification requirements as well as those conducted to verify compliance with 10 CFR 50 Appendix B are now accomplished by personnel from our Quality Assurance Section (QAS). These audits are, therefore, performed by or under the direct guidance of a qualified lead auditor from the QAS. It should be noted that audits performed at the plant site by plant staff personnel are considered as technical audits. We are therefore in compliance.

Violation 6.d - Clarify that the audits required by the technical specifications will be conducted in accordance with the requirements of ANSI N45.2.12. Your commitment in Section 1.8 of the FSAR to meet the requirements of Criterion XVIII of 10 CFR 50 Appendix B by implementation of the provisions requirements to the extent that the standard states them as requirements. While we agree that current OSRC practices are good from the standpoint of committee review and overview, they do not meet the audit requirements as specified in the technical specifications and FSAR commitments.

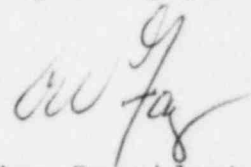
As discussed under violation 5a & 5c above, these audits are being conducted by personnel from our Quality Assurance Section. This policy change ensures compliance with our commitments as described in Section 1.8 of the FSAR including ANSI N45.2.12 and N45.2.23.

We acknowledge your reference to IE Manual Part 9800 which clarifies our concerns regarding the necessity for a 10 CFR 50.59 review of proposed changes to an engineering office layout and specifically notes that such changes do not necessarily require a safety evaluation. The larger question as to specific applicability of 10 CFR 50.59 safety evaluation reviews remains unanswered; however, we are continuing our efforts to develop more detailed guidance and criteria in appropriate administrative procedures.

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As you know, in a line-by-line evaluation of your February 21, 1984 letter and inspection report, we identified approximately 120 items. These included the violations, open items, unresolved items, and program weakness. We are continuing our efforts to address these items. The Modification Request Task Force and Maintenance Request Task Force (discussed in our April 2, 1984 letter) have evaluated approximately 50 of these items to our satisfaction. We are taking necessary actions to resolve these items. Our goal is to have the revised modification request and maintenance request procedures, which encompass many of these resolutions, written and approved by August 3, 1984. Implementation of these procedures, including form changes and training will follow. Our technical manuals group is making significant progress in reviewing the more than 1400 manuals at the plant. The Maintenance Management System development is also proceeding satisfactorily with meetings scheduled weekly. We shall continue our efforts in these areas.

Very truly yours,



C. W. Fay

Vice President-Nuclear Power

