



**Wisconsin Electric** POWER COMPANY  
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May 10, 1985

Mr. H. R. Denton, Director  
Office of Nuclear Reactor Regulation  
U. S. NUCLEAR REGULATORY COMMISSION  
Washington, D. C. 20555

Attention: Mr. J. R. Miller, Chief  
Operating Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
ADDITIONAL INFORMATION IN RESPONSE  
TO GENERIC LETTER 83-28  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated March 13, 1985 requested us to provide additional information for items 2.2.1, 2.2.2, and 4.5.3 from our response to Generic Letter 83-28. You had judged our previous responses to be incomplete and identified the specific information to be addressed in an enclosure to your March 13 letter. We are providing our responses to that request with this letter. The first item 2.2.1 is discussed at some length in the attachment to this letter.

The second item on your list was 2.2.2. This item concerned our vendor equipment information program. You requested us to supplement our response, which referenced the NUTAC Vendor Equipment Technical Information Program (VETIP), to address maintaining an interface between all vendors of safety-related equipment and the utility. We maintain that the NUTAC report issued in March 1984, which describes the VETIP, is a valid response to the vendor interface issue. Accordingly, it is requested that the NRC reanalyze and reconsider this request for additional information.

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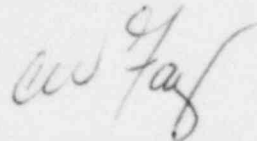
Mr. H. R. Denton

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May 10, 1985

The last element of your March 13, 1985 request concerns item 4.5.3. We recognize this response as being incomplete pending completion of the NRC review of WCAP-10271 and its supplement. Our implementation plan for the Point Beach Nuclear Plant will be submitted after we have had time to study the Commission's evaluation of these documents.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay  
Attachment

Copy to NRC Resident Inspector



DOCKET NOS. 50-266 AND 50-301  
ADDITIONAL INFORMATION IN RESPONSE TO  
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POINT BEACH NUCLEAR PLANT, UNITS 1 and 2

1. Item 2.2.1.1

The criteria for the identification of QA-scope systems are contained within the "Nuclear Power Department Quality Assurance Policy Manual". These system criteria are similar to the criteria listed within Section 2.2 of Generic Letter 83-28. Components and systems which are necessary for the execution of safety-related functions have been identified and are indicated through various means, including color-coded prints and listings. It should be noted that not all the components identified in these prints and listings as QA-scope are safety related as established in the "Nuclear Power Department Quality Assurance Policy Manual". However, in no case are safety-related components excluded from the QA requirements.

The criteria for the designation of individual components were based on Final Safety Analysis Report system requirements, as well as the judgment of qualified individuals within the Nuclear Power Department. In order to better define and document the criteria used to develop these color-coded prints and listings, an independent review is currently in progress. The review will reestablish and redocument the plant definition of safety related and will specify the criteria for the designation of specific components and their functions as safety related. It is not anticipated that any major changes will result.

2. Item 2.2.1.2

The information handling system is described as above and the methods used for its development and validation are as described above. The responsibility for the ongoing maintenance of the QA program is defined in Section 2 of the "Nuclear Power Department Quality Assurance Policy Manual".

3. Item 2.2.1.3

The process whereby the station personnel utilize this "information handling system" to determine the applicability of QA to the maintenance, surveillance, parts replacement, and other activities defined in the introduction to 10 CFR 50, Appendix B, are described in procedures contained within the

"Operating Point Beach Nuclear Plant Administrative Control Policies and Procedures Manual" and other documents, such as the "Nuclear Power Department Quality Assurance Procedures Manual". The majority of these procedures cover one or more aspects of the application of the Appendix B criteria. Following is a brief synopsis of the process.

After identification of the deficient condition which would require maintenance or parts replacement, a maintenance work request (MWR) is prepared. These MWR's are all submitted to the Operations QA representative who reviews the maintenance proposed and the equipment for which the work is anticipated and, using the guidance contained within the "Nuclear Power Department Quality Assurance Policy Manual", establishes the necessary QA considerations for the proposed maintenance or parts replacement. This individual is experienced in the application of QA criteria through on-the-job training and experience, as well as membership in the standing Quality, Standards, and Records Organization (QSRO). The QA considerations are reviewed by supervisory personnel prior to the actual implementation of the requirements. This activity provides assurance that proper QA determinations are made.

A similar process is followed for the consideration and inclusion of QA requirements in surveillance and testing activities. The procedures for surveillance and testing of safety-related equipment are subject to review as required by Technical Specifications. This review is accomplished by the Manager's Supervisory Staff and considers QA requirements.

4. Item 2.2.1.4

The management controls utilized to assure conformation to the above program include a program of QA audits and surveillances, in addition to the normal supervisory involvement. This level of activity has been found to be sufficient.

5. Item 2.2.1.5

The requirements for the procurement of safety-related equipment are contained in procedures which contain guidance for the assurance that the new or replacement equipment continue to maintain the parameters established for the initial qualification of the equipment. The requirements for the procurement of new equipment are governed by the plant modification request procedure. Where necessary, these procedures require that qualification testing be performed for expected safety service conditions. This modification request procedure, as well as the QA procedures, provides for the procurement and receipt of required qualification documentation prior to the release of components into service.

The control mechanisms for an operating plant are the ongoing assurance methods, as described above, housed in the QA program. Modifications and the possible impact on structures and mechanical and electrical systems, as well as extensions or changes to the boundaries for criteria, including the QA controls, are reviewed in accordance with the modification request procedure which is part of the QA program.

6. Item 2.2.1.6

Although no separate "program" exists for this purpose, as can be seen from the above, a considerable number of practices and procedures exist which define the elements of the equipment classification process. The criteria developed under the review process outlined in Item 2.2.1.1 above form the basis of the equipment classification process.