



**Wisconsin
Electric**
POWER COMPANY

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VPNPD-92-319

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October 2, 1992

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO NOTICE OF VIOLATION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter from Mr. Robert L. Greger dated September 4, 1992, the Nuclear Regulatory Commission forwarded to Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, the results of the routine safety inspection conducted by Messrs. K. R. Jury and J. Gadzala from June 29 through August 23, 1992. This inspection report included a Notice of Violation (Notice). The Notice describes a violation of Point Beach Nuclear Plant Technical Specification 15.6.8, "Plant Operating Procedures," Section 15.6.8.1.

We have reviewed this Notice and, pursuant to the provisions of 10 CFR 2.201, have prepared a written response of explanation concerning the identified violation. Our written response is included as an attachment to this letter.

The violation identified in the Notice pertains to procedural requirements for returning equipment, that has been isolated, back to service. Technical Specification 15.6.8.1 requires that the plant be operated and maintained in accordance with approved procedures. Our procedure, PBNP 4.13, "Equipment Isolation Procedure," Step 6.2.3, requires that equipment not be returned to service until the danger (equipment isolation) tag location sheet authorizes the return of the equipment to the operations group. In addition, Step 6.4 of the procedure requires that the positioning of equipment identified on the danger tag location sheet be performed by a qualified individual. The identified violation occurred on July 24, 1992, when a battery cable for the auxiliary diesel (G501) was reconnected to the battery prior to the danger

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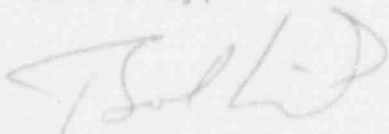
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tag location sheet authorizing this equipment to be returned to service. The reconnection was completed by a contractor employee who was not qualified to perform this task.

This violation characterizes a contractor employee's failure to conform to the PBNP equipment isolation procedure. An event investigation team had previously been chartered to review the circumstances of an event which occurred on June 10, 1992, which similarly is believed to have involved a contractor's violation of PBNP 4.13. Based on the evaluation performed by the event investigation team for the June 10, 1992, event and an ad-hoc interdisciplinary group formed to review the July 24, 1992, event identified in the Notice, corrective actions have been taken or are planned to be taken to respond to the identified deficiencies. These corrective actions are intended to implement enhanced management controls and practices to ensure conformance to PBNP 4.13.

We believe that the attached reply is responsive to the concerns and fulfills the requirements identified in your September 4, 1992, letter. If you have any questions or require additional information regarding this response, please contact us.

Sincerely,



Bob Link
Vice President
Nuclear Power

MFB/jg

Enclosure

cc: Regional Administrator, NRC Region I
NRC Resident Inspector

REPLY TO NOTICE OF VIOLATION

WISCONSIN ELECTRIC POWER COMPANY
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
DOCKETS 50-266 AND 50-301
LICENSE NOS. DPR-24 AND DPR-27

During the routine safety inspection conducted at our Point Beach Nuclear Plant from June 29 through August 23, 1992, one violation of NRC requirements was identified. The identified violation was classified as a Severity Level IV. Inspection Report Numbers 50-266/92015(DRP) and 50-301/92015(DRP) and the Notice of Violation (Notice) transmitted to Wisconsin Electric on September 1, 1992, provide details regarding the violation. We agree that the event and circumstances described in the Notice are accurately characterized.

In accordance with the instructions provided in the Notice, our reply to the alleged violation includes: (1) the reason for the violation; (2) corrective action taken; (3) corrective action taken to avoid further violations; and (4) the date when full compliance will be achieved.

VIOLATION

"Technical Specification 15.6.8.1 requires that the plant be operated and maintained in accordance with approved procedures. Procedure PBNP 4.13, Equipment Isolation Procedure, Step 6.2.3, requires that equipment not be returned to service until the danger tag location sheet authorizes the return of the equipment to the operations group. Step 6.4, requires that positioning a component per the danger tag location sheet shall be performed by a qualified red tagger."

"Contrary to the above, on July 24, a battery cable on the G-501 auxiliary diesel was reconnected to the battery prior to the danger tag location sheet authorizing the return to service of the equipment to the operations group. Also the person who reconnected the cable was not a qualified red tagger."

RESPONSE TO VIOLATION

1. REASON FOR THE VIOLATION

The event cited in the Notice of Violation occurred on July 24, 1992, during the ongoing overhaul of the gas turbine generator (G05) installed at PBNP. Work on the gas turbine auxiliary power diesel (G501) was being supported by a contractor employee. The contractor employee had not been authorized general plant access and, therefore, was required to be escorted. During performance of his assigned work, the contractor employee replaced a power cable on the diesel starting battery. The cable had been danger tagged, in the

disconnected condition, in accordance with PBNP 4.13, "Equipment Isolation Procedure." PBNP 4.13, Step 6.4, requires that positioning a component per the danger tag location sheet be done by a person qualified as a danger tagger.

The contractor employee involved, noted the installed danger tag but did not understand that the tag precluded him from reattaching the cable on the battery. The contractor's understanding of the equipment isolation requirements was that he was prohibited from operating the auxiliary power diesel following the completion of the work, but did not prevent him from attaching the battery cable. A contributing factor to the failure of the contractor employee to completely understand the isolation requirements of this system was that a sufficiently thorough pre-job briefing had not been conducted prior to beginning the work activities. An additional contributing factor was identified as different training requirements dependent on the type of plant access required by a contractor. The contractor employee involved in this event was classified as a short-term visitor and was authorized escort required access. The contractor employee was being escorted by a PBNP Security Officer. Short-term visitors, such as this contractor employee, are not normally granted unescorted access to PBNP and, therefore, do not receive general employee training (GET). GET would have provided the contractor employee training on the equipment isolation system and procedural requirements which may have prevented the event.

2. CORRECTIVE ACTION TAKEN

In response to this violation, corrective actions were taken immediately following identification of the inappropriately installed battery cable. Also, additional corrective actions have been completed to date in response to this event to prevent recurrence of similar events.

A. Immediate Corrective Action

- Work on the auxiliary power diesel had been completed when the condition was discovered by operations personnel tasked to remove the danger tags associated with the auxiliary power diesel. The tagout of the diesel was subsequently cleared by qualified operations personnel and the equipment configuration verified as correct.

- The contractor employee was counselled regarding equipment isolation requirements, the personal safety implications of taking actions prohibited by the equipment isolation requirements, and the incorrectness of his actions based on this event
- The PBNP contractor liaison and manager responsible for the oversight of the gas turbine overhaul were counselled of their responsibility and obligation to brief contractor personnel regarding equipment isolation procedure requirements.

B. Additional Corrective Actions Taken To Date

- An ad-hoc interdisciplinary group met on multiple occasions to discuss the event, determine the causes, and formulate corrective actions. The ad-hoc interdisciplinary group also met with the event investigation team which had been formed to review the equipment isolation procedural violation that occurred on June 10, 1992.
- Past occurrences of similar equipment isolation procedural violation events were reviewed to determine if there is a commonality between the causes of these events. Causes identified included the inadequacy of the pre-job briefings for escorted personnel and the need to identify specific guidelines for use in performing pre-job briefings. In addition, it was identified that additional emphasis on the duties and responsibilities of Wisconsin Electric liaison personnel dealing with contractors was needed.
- On September 30, 1992, the Plant Manager issued a memorandum to all Nuclear Power Department management personnel summarizing the violations of the equipment isolation procedure. The memorandum reinforces the importance and requirements of conducting adequate pre-job briefings and the requirements contained in PBNP 4.13, "Equipment Isolation Procedure." Specifically, the memorandum summarizes the responsibilities of supervisors and contractor liaisons as defined in PBNP 4.13, Step 5.5.

3. CORRECTIVE ACTION TO BE TAKEN TO PREVENT RECURRENCE

Based on the reviews of equipment isolation procedure violation events performed by the ad-hoc interdisciplinary group and the event investigation team, the following actions will be taken to preclude recurrence of similar events:

- A. PBNP 4.13, "Equipment Isolation Procedure," is being revised to clearly define the responsibilities of operations, maintenance, and engineering personnel involved with the equipment isolation procedure. This revision will include the requirement for the Wisconsin Electric contractor liaison, who is responsible for oversight of contractor work activities, to sign the equipment isolation tag record sheet. We plan to have these revisions to PBNP 4.13 completed by November 20, 1992.
- B. Nuclear Power Department personnel with authorization to approve visitor access to the PBNP site will be required to identify the necessary pre-job briefing requirements prior to authorizing contractor or visitor access to PBNP. This will be accomplished by enhancements to PBNP Form PBF-7015, "Pre-Work Conference Checklist," and SEC-79, "Escort, Vehicle and Access Level Authorization and Control." The revisions to PBF-7015 and SEC-79 are scheduled to be completed by November 20, 1992.

4. DATE OF FULL COMPLIANCE

All corrective actions, identified above, which we believe will result in full compliance with Technical Specification 15.6.8.1 as it relates to proper implementation of equipment isolation requirements have been completed or will be completed by November 20, 1992.