



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

July 3, 1985

VPNPD-85-41
NRC-85-14

Mr. Hugh L. Thompson, Jr., Director
Division of Licensing
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Thompson:

COMMENTS ON GENERIC LETTER 85-07
IMPLEMENTATION OF INTEGRATED SCHEDULES FOR
PLANT MODIFICATIONS

This is in response to your letter of May 2, 1985, which requested comments on the Integrated Living Schedule (ILS) concept. While we have attached the questionnaire transmitted with your letter, some elaboration of our position may be appropriate.

We have been aware of the ILS process for some time and have been interested in its development and use at other utilities. We have concluded that integrated scheduling has benefited the regulatory/modification process at specific plants and has enabled major modification programs to be implemented in a logical and cost effective manner. We expect that under similar circumstances it might be beneficial for us to pursue major modification programs using integrated scheduling concepts. At the present time, however, we conclude that this process would not enhance the efficiency of the modification effort, the safety of plant operation, or the functioning of the regulatory interfaces that are ongoing. With our operating philosophy of maintaining manageable, and thereby efficient, contractor and Company work forces we have been able to effectively control our modification programs from a project and a regulatory standpoint. For example, the Unit 1 steam generator replacement project completed last year was accomplished with a peak craft labor force of only 282 people.

In the 15 years since our Point Beach Nuclear Plant began operation, we have managed to meet our NRC commitments and implement major modifications without benefit of an ILS. We are concerned that the adoption of a formal ILS would lead to an increased paperwork burden to support the necessary information exchange with NRC as well as to maintain the program fully documented and up-to-date. At this time, it appears to us that

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July 3, 1985

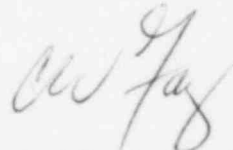
the investment of the necessary manpower would produce minimal benefit.

Nonetheless, we plan on upgrading our internal scheduling effort to develop a better picture of future efforts. In doing so, we assume that the option of negotiating the schedule for a particular backfit item or other modification requirement still remains open to us on an ad hoc basis. Furthermore, we might consider a more formal ILS if faced with an unexpectedly large number of new regulatory backfit requirements or another effort as large as NUREG-0737.

Finally, we were pleased to note from your May 2 letter that NRC is not solely dedicated to probability risk assessment techniques in establishing prioritization. Certainly other considerations such as good engineering judgement, safety, and economic factors must continue to play a major role in the decision-making process.

Thank you for this opportunity to comment. If you wish to further discuss our views on this matter, please feel free to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. W. Fay".

Vice President-Nuclear Power

C. W. Fay

ENCLOSURE 2

RESPONSE FORMAT - GENERIC LETTER 85- 07

PLANT NAME: POINT BEACH NUCLEAR PLANT, Units 1 & 2

UTILITY: WISCONSIN ELECTRIC POWER COMPANY

I. INTENTIONS

- A. Intend to work with the staff to develop an ILS _____
- B. Have reservations that must be resolved before developing ILS _____
- C. Do not presently intend to negotiate an ILS with the staff _____
- D. Plan to implement an informal ILS only X

II. STATUS

A. If you answered I.A above:

1. Have you settled on a method for prioritizing the work at your plant(s)?

Circle One: Yes No

If yes, select best description:

Engineering judgement _____
Analytic Hierarchy process _____
Risk based analysis _____
Cost-benefit analysis _____
Other (please describe) _____

If no, provide estimated date for selecting a methodology: _____
Date

or

If not presently available, provide estimated date for scheduling the selection of a methodology: _____

2. What is your estimated date for making a submittal to the NRC- _____

or

If not presently available, planned date for scheduling a submittal to the NRC _____

B. If you answered I.B above:

1. Please explain your reservations on separate sheet(s) or provide your schedule for supplying an explanation

See separate sheet(s)

or

Separate submittal scheduled for

(Date)

2. If available to meet with the staff to discuss your concerns, propose a time frame for such a meeting and provide a contact that can make arrangements

Contact/Time Frame _____

Phone Number _____

C. If you answered I.C

1. Would you be willing to meet with the staff to discuss the development of an ILS for your facility(s)?

Circle One: Yes No

If yes, propose a time frame for such a meeting and provide a contact that can make arrangements.

Contact _____

Time Frame _____

Phone Number _____

If no, any constructive comments you have would be appreciated.

III. ADDITIONAL ITEMS

Please make any suggestions you may have as to how a utility sponsored availability/reliability project might be credited for plant safety enhancement. Provide additional constructive comments as appropriate.

(PLEASE SEE ACCOMPANYING LETTER)