

October 17, 1996

Mr. Robert Link
Vice President Nuclear Power
Wisconsin Electric Power Company
231 West Michigan Street - P379
Milwaukee, WI 53201

Dear Mr. Link:

This letter acknowledges receipt of your letter dated May 17, 1996, which documented your response to the three Notices of Violation associated with Inspection Report 50-266/96002(DRP); 50-301/96002(DRP) transmitted to you in our letter of April 17, 1996. We noted that your response to two of the three violations was incomplete and did not address all of the relevant issues.

With respect to the violation of 10 CFR Part 50.71(e)(4) for the failure to maintain an updated Final Safety Analysis Report (FSAR), you did not provide a basis for not revising those sections of the FSAR that describe systems which rely on service water cooling, to reflect a change in the design service water temperature. In addition, you did not state in your response when the current FSAR will be in full compliance with the requirements of 10 CFR Part 50.71(e).

With respect to your response to the violation of Criterion XVI of Appendix B to 10 CFR Part 50, for the failure to take adequate corrective action for deficiencies identified in 1993 pertaining to performance testing of the spent fuel pool (SFP) heat exchangers, we have the following concerns:

1) Your response indicates that you do not understand our concern with the original corrective actions you planned to implement to address the failure to meet test acceptance criteria during SFP heat exchanger performance testing. Your response states,

"The inspection report narrative implies that our planned actions for collecting acceptable performance data were technically inadequate. Our selected option of installing more accurate instrumentation was based on avoiding the need to place the SFP cooling system into an unusual test configuration. Improved instrumentation would have allowed operators to routinely gather accurate performance data without having to adjust valves, change pump combinations, and raise SFP liquid temperature higher than normal."

We determined that you did not obtain meaningful test results because you conducted each performance test with insufficient heat load on the SFP heat exchangers. More accurate instrumentation will not provide data on actual heat exchanger performance unless an adequate heat load has been established. We noted that the corrective actions described in your response did include increasing the heat load during the heat exchanger performance test.

2) In your response, you stated that the engineers responsible for conducting the heat exchanger performance tests, were new and inexperienced. However, your response did not address the apparent failure to provide sufficient management oversight. This is particularly relevant since lack of management involvement was a concern identified in the 1993 NRC Service Water System Operational Performance Inspection, and you did not meet commitments in your 1990 response to NRC Generic Letter 89-13, "Service Water System Problems Affecting Safety-Related Equipment".

We have no additional questions with regard to the violation of 10 CFR Part 50, Appendix B, Criterion V, relating to adherence to procedure NP 8.4.8, Revision 1, "Requirements for Scaffold near Safety-Related Equipment".

3) It is our understanding that you intend to address our comments in this letter based on a conference call between Mr. M. Dapas of my staff and selected members of your staff on October 9, 1996, in which Mr. Dapas discussed the basis for our comments.

You are required to respond to this letter and should follow the instructions previously specified in the Notice of Violation when preparing your response. You should document your reply to our comments in this letter relating to your original response to the Notice of Violation, and any additional actions you plan to prevent recurrence. After reviewing your response to this letter, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further enforcement action is necessary to ensure compliance with regulatory requirements.

In accordance with 10 CFR 2.790 of the Commission's regulations, a copy of this letter will be placed in the NRC Public Document Room.

Should you have any further questions, please do not hesitate to contact me or the resident inspector staff.

Sincerely,

/s/John A. Grobe for

James L. Caldwell, Acting Director
Division of Reactor Projects

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DATE	10/16/96	10/16/96				

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R. Link

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Docket No. 50-266

Docket No. 50-301

cc: S. A. Patulski, Site General Manager
A. J. Cayia, Plant Manager
Virgil Kanable, Chief
Boiler Section
Cheryl L. Parrino, Chairman,
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