



**Wisconsin Electric** POWER COMPANY  
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August 1, 1985

Mr. James R. Keppler, Regional Administrator  
Office of Inspection & Enforcement  
Region III  
U. S. NUCLEAR REGULATORY COMMISSION  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137

Attention: Mr. Luis A. Reyes, Chief  
Operation Branch

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
RESPONSE TO NOTICE OF DEVIATION  
POINT BEACH NUCLEAR PLANT

This letter is in response to the Notice of Deviation, forwarded with your letter dated July 2, 1985 concerning activities conducted at the Point Beach Nuclear Plant (PBNP). The notice stated that no objective evidence could be identified to support commitments made in our letter dated July 31, 1981, responding to NRC Generic letter 81-01 regarding the qualification requirements recommended in Regulatory Guide 1.58 and Regulatory Guide 1.146. You specifically identified three commitments from that letter which are not being met:

1. Accomplish and document the evaluation of personnel to meet minimum qualification requirements.
2. Accomplish and document periodic evaluations of inspectors' work performance to ensure a continued high level of qualification.
3. Accomplish and document the demonstration of an inspector's proficiency before he is permitted to perform independent inspections.

While we continue to believe that these commitments are being met, we recognize that the documentation to establish this fact should be improved. The following discussion describes our compliance with these commitments and our plans to improve documentation.

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August 1, 1985

Concerning the first item, the evaluation of personnel to meet the minimum qualification requirements for specific positions is a part of the promotion or hiring process. All personnel hired or promoted at PBNP are evaluated to meet minimum qualification requirements. The evaluations consider related work experience, education, training, aptitude and knowledge of applicable codes, standards and regulatory requirements. A successful candidate must exhibit competence in these areas as they apply to specific jobs. Final determination of whether a candidate possesses the necessary skills to fulfill a quality-related position is made by the Manager. As stated in Section 1.8 of the FSAR, PBNP personnel conform to the qualification requirements of ANSI N18.1-1971 and are therefore qualified to perform plant inspection, examination and testing activities.

The second and third items from the notice concern periodic evaluation of inspectors' work performance and certification of inspectors' proficiency before they are permitted to perform independent inspections. The accomplishment of these commitments are related and therefore discussed together. As you know, at PBNP we recognize only one level of qualification and do not differentiate quality inspections apart from any particular job or task performance. General inspections of work quality are inherently performed by the individual as part of his job. These general inspections are in addition to the quality inspections performed by the worker's first-line supervisor. Performance of quality inspections by the first-line supervisor in conjunction with the worker provides feedback and training to assure acceptable task proficiency. The supervisor's quality inspection also prevents an individual from functioning independently of fully-qualified personnel until adequate proficiency is demonstrated. Additionally, under this concept, an individual is not promoted to first-line supervision until his competency is demonstrated. Periodic performance evaluations are made for PBNP personnel by their respective supervisors. Consideration of their adherence to quality practices, including inspections, are integral to the evaluations. It is our belief that the practices mentioned above have always been in compliance with our commitments.

We recognize that documentation of the above practices could be improved. During the audit, a file containing personnel qualification and proficiency profiles was presented to the inspector for review. Education, training, experience, and related information are summarized in these profiles. One of the intended purposes of the profiles is to document an individual's credentials as they apply to Quality Assurance activities. To improve documentation in this area, the profiles will be updated for those personnel performing quality inspections of work. The updated profiles will better document individual qualifications and periodic reevaluations as they apply to Quality Assurance activities. These profiles will be updated by October 31, 1985.

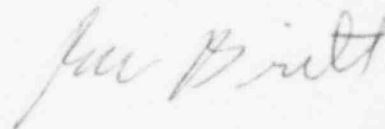
You should also be aware that the Point Beach Training Group is presently working on establishing an accredited training program in accordance with INPO criteria. A part of this program is to specifically identify and document tasks that are performed by specific job categories at PBNP. These tasks will include Quality Assurance activities such as quality inspections for appropriate job positions. Identification of these tasks will be used to establish the minimum qualification requirements for training programs at PBNP, including those for first-line supervisors who perform quality inspections. Demonstration of proficiency for critical tasks associated with a particular job will be required for

August 1, 1985

qualification and independent performance of duties. Although this program emphasizes initial qualification, it is designed to accommodate training needs on a continuing basis through feedback from job performance evaluations, plant and industry experience, regulatory requirements, industry standards, and other information sources. The goal for accreditation of the supervisory training program is October 1, 1986. In addition, certain management and supervisory personnel who are involved with quality inspection activities are scheduled to receive a Quality Control inspector course. We expect to complete this training by the end of September 1985.

In summary, we believe that personnel involved in inspection, examination, and testing activities at Point Beach meet or exceed the qualification requirements of ANSI N.81-1971 and that the basis used for certification of these personnel meets the intent of Regulatory Guide 1.58. The corrective actions discussed in this letter should further clarify our present methods of controlling the qualification of inspection, examination, and testing personnel and provide more thorough documentation of these activities.

Very truly yours,



President

R. W. Britt

CWK/cj

Copy to NRC Resident Inspector