



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

September 6, 1985

Ref: VPNPD-85-300
NRC-85-98

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

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
RESPONSE TO INSPECTION REPORT NOS.
50-266/85011 AND 50-301/85011
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This is in response to the Notice of Violation issued August 1, 1985, as a result of the inspections conducted on June 24-27 and July 3 and 18, 1985. The violation concerned a calibration error which was discovered on detector "1" associated with the multi-channel analyzer. The following actions have been taken to evaluate the consequences of the calibration error and to reasonably assure that it will not recur. Although a response was requested within 30 days of the date of the notice, as a result of a discussion with the Point Beach Senior Resident Inspector, we were permitted a one-week extension to this time period to complete this response.

As an immediate corrective action, the computer software was modified to prohibit access to the charcoal geometries in question on detector "1". The charcoal geometries for detector "1" will remain inaccessible until recalibration for these geometries is completed. We expect to accomplish recalibration in October 1985 when a new standard is available (Open Item 266/85011-02; 301/85011-02).

Past records have been reviewed and all low-volume charcoal samples (restricted area and effluent release) analyzed on detector "1" have been identified. The review and recalculation of all

8509200173 850906
PDR ADOCK 05000266
Q PDR

-1-

IE06
Delete RIII

110

SEP 10 1985

Mr. J. G. Keppler
September 6, 1985
Page 2

effluent release samples affected indicated that no administrative or Technical Specification violations directly related to activity magnitude occurred. The affected release samples identified above have been recalculated, applying a correction factor of 3. The monthly release reports and semiannual reports for 1984 and the first half of 1985 have been adjusted. Corrections to the 1984 semiannual reports have been sent to the NRC (Violation 266/85011-03; 301/85011-03).

The review and recalculation of all affected restricted area samples indicated that some administrative procedure violations occurred, but again no Technical Specification violations directly related to activity magnitude were identified.

The procedure violated was HP 4.4, MINOR, Revision 6, December 21, 1984, Section 2.1.2. The violation related to lack of uptake timekeeping associated with areas greater than 25% MPC. There were ten samples counted on detector "1" that were above 25% MPC when the calibration error was accounted for.

Using the worst case corrected sampling results, uptakes were calculated for the individuals involved by referring to completed RWP's and backfitting exposure timekeeping logs (CHP-68). No cases were found where any individual exceeded 40 MPC-hours within a seven-day period. A Nonconformance Report (NCR 85-037) has been initiated for the above procedural violation (Unresolved Item 266/85011-04; 301/85011-04).

QA/QC weaknesses have been reviewed and appropriate procedure changes have been made to Chemistry Analytical Methods and Procedures (CAMP) 300 and 400.

CAMP-300, "MCA Efficiency Calibrations", has been modified to require that initial detector calibrations be verified by comparing like geometries of the new detector to those of a previously calibrated detector. The comparison results are to be logged on Form CHP-199.

CAMP-300 has also been modified to require that, following detector geometry recalibrations, the new energy versus efficiency curve be verified to be consistent with past calibrations for each geometry. This includes a visual check of the shape of the curve as well as a point-by-point comparison of actual values.

The above modifications to CAMP-300 will prevent basic errors made during initial and recalibrations done on MCA detectors (Open Item 266/85011-05; 301/85011-05).

Mr. J. G. Keppler
September 6, 1985
Page 3

CAMI-400, "Preparation of MCA Calibration Standards", has been modified to require the use of separate calibration data sheets for each standard geometry made up as well as for the working standard dilution. A chemistry form (CHP-199) has been created for this purpose. Data sheets used prior to this change had multiple columns to record data for several geometries. The root cause of the calibration error was a transcription error on the formerly used sheets. Use of separate sheets will minimize the potential for this type of error.

We have initiated CAMP-106, "Interlaboratory Radiological Cross-Check". Consideration will be given to expanding this program to include more geometries, i.e., air particulate and charcoal, and/or switching to vendor-supplied standard geometries for cross-checking.

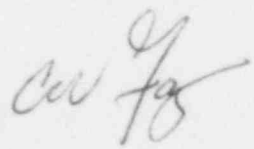
Since the aforementioned corrective actions, evaluations, and procedure changes have been accomplished and NCR 85-037 has been initiated, we believe that we are now in full compliance with the provisions of 10 CFR 20.201.

If you have any questions concerning this information, please contact my office.

Very truly yours,

C. W. Fay
Vice President
Nuclear Power

Copy to NRC Resident Inspector

A handwritten signature in dark ink, appearing to read 'CW Fay', is located to the right of the typed name 'C. W. Fay'.