



Point Beach Nuclear Plant
6610 Nuclear Rd., Two Rivers, WI 54241

(414) 755-2321

NPL 97-0230

May 5, 1997

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

Ladies/Gentlemen:

DOCKET 50-301
RESTART DOCUMENTATION
POINT BEACH NUCLEAR PLANT, UNIT 2

Pursuant to discussions conducted at a January 31, 1997, NRC/Wisconsin Electric senior management meeting, we are enclosing documentation for review by your staff to support restart issues as identified on the Unit 2 Startup Commitment List. The items are:

#8: Review 20% of the Operations Technical Specification, Inservice Test, and Operations Refueling Test related surveillance procedures, with concentration on those involving major equipment. Upgrade as necessary to include appropriate initial conditions, return to service lineups, properly specified, independent verification, reviewing acceptance criteria, and Technical Specification implementation.

We are enclosing the following procedures which were reviewed per this commitment: IT 04, Low Head Safety Injection Pumps and Valves (Quarterly), Revision 35; IT 13, Component Cooling Water Pumps and Valves (Quarterly), Revision 13; IT 115, Instrument Air Valves (Quarterly), Revision 9; IT 215, SI Valves (Cold Shutdown), Revision 7; IT 325, CVCS Valves (Cold Shutdown), Revision 8; IT 525B, Leakage Reduction and Preventive Maintenance Program Test of 2SI-896A&B, SI Pump Suction Valves (Refueling), Revision 8; IT 535B, Leakage Reduction and Preventive Maintenance Program Test of the Train B HHSI and RHR Systems (Refueling), Revision 4; IT 536, Containment Pump B Suction Line Leak Test (Refueling Shutdown), Revision 6; Leakage Reduction and Preventive Maintenance Program Test of Post-Accident Containment Atmospheric Sampling System (Refueling), Revision 13; TS 10A, Containment Airlock Door Seal Testing, Revision 21; ORT 3, Safety Injection Actuation with Loss of Engineered Safeguards AC, Revision 28; ORT 6, Containment Spray Sequence Test, Revision 16; ORT 9A, Preparation for Integrated Leak Rate Test with Core Off-Loaded, Revision 0; and, ORT 10A, Recovery from Integrated Leak Rate Test with Core Off-Loaded, Revision 0. Also enclosed are the results of the independent review.

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PDR ADOCK 05000301
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#13: Review other operating procedures that contain maintenance activities and revise as necessary to ensure PMT and QC are properly addressed by those procedures.

We are enclosing the independent review results. Prior documentation supporting this action was sent via PBL 97-0047 dated February 10, 1997.

#23: Review 20% of the work orders performed since January 1, 1995 on Unit 2 or Common PSA safety significant systems (e.g., AFW, SW, EDG, IA, 4.16 kV, gas turbine, and CCW) to verify adequate PMT was performed to ensure system/component safety function.

We are enclosing letter PBM 97-0200 dated February 26, 1997 and the following condition report status updates: 95-083; 95-098; 95-149; 95-158; 95-205; 95-333; 95-408; 95-409; 95-444; 95-489; 95-496; 95-526; 95-636; 96-023; 96-033; 96-070; 96-076; 96-080; 96-099; 96-119; 96-131; 96-182; 96-207; 96-265; 96-432; 96-725; 96-727; 96-809; 96-827; 96-829; 96-850; 96-964; 96-974; 96-1230; 96-1301; 96-1322; 96-1410; 96-1689; 97-0060; 95-079; 95-155; 95-321; 95-331; 95-440; 95-452; 95-493; 95-597; 96-231; 96-285; 96-567; 96-642; 96-740; 96-1327; 96-1435; 96-1772; and 96-1839. Also enclosed are the results of the independent review.

#32: Implement interim improvements for the condition reporting process, based on a review of assessments and identified recommendations for improving that process.

We are enclosing an Assessment of the Corrective Action Program dated April 29, 1997. Also enclosed are the results of the independent review.

#57: Ensure modification request 96-069 that replaces four breakers (1Y-06-01, 1Y-06-03, 1Y-06-05 and 1Y-06-11) associated with instrument bus 1Y-06 is complete.

We are enclosing modification request 96-069*A and 96-069*B and its associated safety evaluation report (SFF 97-032), and Work Orders 9612056, 9612057, 9612072 and 9612073. Also enclosed are the results of the independent review.

#59: Ensure modification request 96-070 that replaces molded case circuit breakers associated with instrument buses 2Y-05 and 2Y-06 is complete.

We are enclosing modification request 96-070 and associated safety evaluation screening, condition report 96-539, and Work Orders 9612082, 9612084, 9612086, 9612087, 9612088, and 9612094. Also enclosed are the results of the independent review.

#75: Revise the initial and requalification operator training plans to include a review of the administrative procedures identified as significant to daily operation of the plant during each two year operations training plan.

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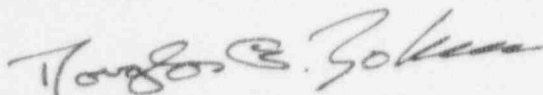
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We are enclosing letter NPM 97-0190 dated April 15, 1997, TRCR 86.0, "Administrative," Revision 12, and TRPR 33.0, "Licensed Operator Requalification Training Program," Revision 5. Also enclosed are the results of the independent review.

Also enclosed are the Unit 2 Core Load Issues, Unit 2 Startup Commitment List and Unit 2 Restart Commitment Summary all dated May 1, 1997.

Sincerely,

A handwritten signature in dark ink, appearing to read "Douglas F. Johnson". The signature is fluid and cursive, with a large initial "D" and a long, sweeping underline.

Douglas F. Johnson
Manager-
Regulatory Services & Licensing

MBK/lam

Enclosures

cc: NRC Regional Administrator

May 1, 1997 Restart Commitment Status

	<u>April 17</u>	<u>April 23</u>	<u>May 1</u>
Scheduled But Not Started	4	4	4
Awaiting Plant Condition Changes	16	16	16
In Progress	24	26	22
In Closeout Verification Process	10	6	5
Done	27	29	34

PBNP UNIT 2 CORE LOAD ISSUES

As of May 1, 1997

RESTART COMMITMENTS REQUIRING WORK BEFORE CORE LOAD

Where discrepancies are identified during conduct of each of these commitments, appropriate corrective and preventive actions will be taken prior to core load commensurate with their safety significance.

ID #	Description	What Must Be Done Prior to Core Load	Work Status	Independent Verification Status
1	Complete a detailed Unit 2 Containment Materiel Condition Assessment, addressing housekeeping, system walkdowns, materiel condition, and instrumentation. Extensive work inside Containment was conducted this outage due to the Steam Generator replacement project.	Complete the assessment for systems and components needed for core load.	In progress.	Draft independent verification supports core load.
2	Walkdown all accessible Unit 2 and common Maintenance Rule systems for adequate visual material condition.	Complete the walkdown of those systems and components needed for core load.	In progress.	Independent verification drafted.
14	Review equipment return to service testing requirements prior to the following U2R22 mode change readiness reviews to ensure the required equipment is operable prior to changing modes: core reload, leaving cold shutdown, and the approach to criticality.	Complete a Readiness Review prior to core load.	Will be conducted approximately 7-10 days prior to core load.	Independent verification drafted.
17	Review 50.59 screenings conducted in 1996. Upgrade those determined to require a 50.59 evaluation.	Complete the review. Prior to core load, upgrade those screenings needed to support core load (4).	Two upgrades completed of the four needed.	Final independent verification supports core load.
19	Conduct a review of 50.59 evaluations from this outage. Ensure all conditions of the evaluations have been completed.	Complete the review. Ensure conditions needed to support core load are completed prior to core loading.	In progress.	Draft independent verification supports core load.

20	Review items from existing open item lists (e.g., NUTRK) to identify potentially degraded equipment.	Complete the review prior to core load.	In progress.	Independent verification drafted.
22	All open operability evaluations for Unit 2 and common equipment will be reviewed for acceptable closure of the degraded equipment issue. Disposition outstanding issues in accordance with 10CFR50.59 and Generic Letter 91-18.	Complete the review for those Condition Reports needed to support core load.	In progress.	Independent verification drafted.
24	Complete an additional Outage Safety Review for the startup phase of the outage.	Complete the review prior to core load.	Waiting for closer to core load date.	Draft independent verification supports core load.
27	Test all EDGs in accordance with revised ORT-3 and DCS-3.1.11. Return the electrical systems to normal alignment prior to leaving cold shutdown.	Complete the testing of EDGs iaw revised ORT-3 and DCS-3.1.11 prior to core load.	In progress.	Independent verification drafted.
34	Upgrade Unit 2 operations checklists to include requirements for initials, time, and date. During the review, verify that the checklists are technically accurate.	Complete the upgrade for checklists CL-7B and CL-1E.	CL-7B complete.	Independent verification drafted.
38	Modification 96-033 - replace control power transformers on Motor Control Centers 2B32 and 2B42.	Complete the physical work for 67 control power transformers identified in the SER to be done during U2R22.	Physical work completed; awaiting PMT.	Independent verification drafted.
49	Modification 96-053 - replace an elbow in the west service water header.	Accept prior to core load.	In closeout verification.	Independent verification drafted.
61	Work Orders 9613568 and 9613569 - provide bonnet pressure locking relief for the SI-857A and SI-857B valves (interface valves between RHR and High Head SI) on Unit 2.	Complete prior to core load.	Awaiting PMT.	Independent verification drafted.

RESTART COMMITMENTS READY FOR CORE LOAD

ID #	Description	What Must Be Done Prior to Core Load	Work Status	Independent Verification Status
3	Walkdown all accessible Unit 2 and common systems for outstanding work order tags. Note: The scope was expanded to include all accessible Unit 1 systems.	Complete walkdowns for those systems and components needed for core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
6	Complete Work Order 9604151 to perform foreign material exclusion inspections on the Unit 2 4160V safeguards bus 2A-06 and breakers.	Complete prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
7	Complete a review of Unit 2 administrative controls implementing or referencing Technical Specifications to ensure Technical Specification requirements are appropriately reflected in the administrative controls.	Complete the review of Refueling Procedures RP-1A and RP-1B, and Technical Specification Section 15.3.8.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
9	Review the In Service Testing (IST) acceptance criteria for the remaining IST pumps to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Make any changes necessary as a result of this review.	Complete the review for those IST pumps needed to support core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
10	Review the In Service Testing acceptance criteria for all IST valves to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Complete necessary operability evaluations, revise procedures, and resolve Unit 2 equipment discrepancies.	Complete the review for those IST valves needed to support core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.

11	<p>Complete the following regarding installed instrumentation used in the IST program:</p> <ul style="list-style-type: none"> Identify the Unit 2 installed instruments used in the IST program. Review the performance of the identified instruments over the last 3 years. Review the suitability of the instrumentation for use in the IST program. <p>Review all IST pump hydraulic data over the past year for adverse trends.</p> <p>As necessary, make changes as a result of these actions.</p>	Complete for IST program instrumentation needed to support core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
12	<p>Review 20% of the surveillance procedures associated with safety significant non-pump and valve components (such as heat exchangers and fans) to ensure that the surveillance acceptance criteria satisfy the requirements of the plant design basis/accident analysis. Make changes as necessary as a result of this review. Note: This has been expanded to a 100% review.</p>	Complete the review for those surveillance procedures needed to support core load (TS-09 and HRP 11.54).	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
13	<p>Review other operating procedures that contain maintenance activities and revise as necessary to ensure PMT and QC are properly addressed by those procedures.</p>	Complete the review for those operating procedures needed to support core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
15	<p>Review 20% of the work orders performed since January 1, 1995 on Unit 2 or common PSA safety significant systems (AFW, SW, EDG, IA, 4.16 kv, gas turbine, and CCW) to verify adequate PMT was performed to ensure system/component safety function.</p>	Complete the review for those systems/components needed to support core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
23	<p>Review 20% of the Condition Reports closed since January 1, 1995 which are associated with PSA safety significant systems for degraded equipment operability issues to ensure that we have adequately identified and dispositioned operability issues. Note: This has been expanded to a 100% review of PSA safety significant systems.</p>	Complete the review prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.

26	Revise ORT-3 and DCS 3.1.11 to ensure Technical Specification 15.4.6.A.2 testing includes dynamic loading of the EDG with sequenced loads.	Complete the revisions prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
37	Include return to service testing in the plant schedule, both outage and nonoutage.	Complete prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
39	Modification 90-048 - replace Boric Acid and Reactor Makeup Water totalizers, replace the CVCS control switch, replace flow indicators, and refurbish flow controllers. This resolves an Operator workaround issue.	Conditionally accept prior to core load (needs PMT after core load).	Conditionally accepted (needs PMT after core load).	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
40	Modification 94-097 - remove six RCS loop drain valves.	Complete the installation prior to core load (awaiting RCS leak test as PMT).	Installation complete (awaiting RCS leak test as PMT).	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
41	Modification 92-141 - relocate the RHR flow control valve controllers on 2CO3 for human factoring.	Accept prior to core load.	ACCEPTED.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
42	Modification 96-073 - seismically upgrade CCW, SI, RHR, and RHR/letdown piping supports and remove an AFW snubber.	Accept prior to core load.	ACCEPTED.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
46	Modification 96-022 - install a new 125 VDC feed to 480V safeguards bus 2B03.	Accept prior to core load.	ACCEPTED.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.

60	Work Orders 9601506, 9602502, 9603921, 9611267, 9611278, and 9611755 - replace proximity switches and targets with an improved design and overhaul the Fuel Transfer Cart to enhance control system operation. This resolves an Operator workaround issue.	Complete prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
65	Work Order 9606626 - reinstall switches on the Unit 2 Containment hatch third door to allow monitoring of door status.	Complete prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
66	Work order 9611052 - replace the 2P-10B switch, the "B" RHR Pump control switch.	Complete prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.
76	Conduct roundtable discussions with all MSS\SS\DTA personnel regarding conservative decisionmaking, Technical Specification interpretations, and lessons learned from recent regulatory communications and perspectives. Review outlier Technical Specification interpretations for interim applications.	Complete prior to core load.	COMPLETE.	FINAL INDEPENDENT VERIFICATION SUPPORTS CORE LOAD.

POINT BEACH NUCLEAR PLANT UNIT 2 STARTUP COMMITMENT LIST

May 1, 1997 Status Update

ITEMS STILL OPEN

Commitment ID Number	Description	Status
1	Complete a detailed Unit 2 Containment Materiel Condition Assessment, addressing housekeeping, system walkdowns, materiel condition, and instrumentation. Extensive work inside Containment was conducted this outage due to the Steam Generator replacement project.	In progress.
2	Walkdown all accessible Unit 2 and common Maintenance Rule systems for adequate visual material condition.	In progress.
14	Review equipment return to service testing requirements prior to the following U2R22 mode change readiness reviews to ensure the required equipment is operable prior to changing modes: core reload, leaving cold shutdown, and the approach to criticality.	Will occur approximately one week prior to each of the mode changes (core loading, leaving cold shutdown, and reactor startup).
17	Review 50.59 screenings conducted in 1996. Upgrade those determined to require a 50.59 evaluation.	Review completed. 7 of 20 upgradings completed.
18	Review outstanding JCO's. Perform operability determinations and 50.59 evaluations needed to address the issues.	In progress. Two JCO's remain to be resolved.
19	Conduct a review of 50.59 evaluations from this outage. Ensure all conditions of the evaluations have been completed.	Initial review completed. Reviews of emergent 50.59 evaluations ongoing. Tracking completion of conditions through the outage.
20	Review items from existing open item lists (e.g., NUTRK) to identify potentially degraded equipment.	In progress.
21	Review open items from the Design Basis Document development program.	Resolving independent review findings.
22	All open operability evaluations for Unit 2 and common equipment will be reviewed for acceptable closure of the degraded equipment issue. Disposition outstanding issues in accordance with 10CFR50.59 and Generic Letter 91-18.	In progress. This will continue through the outage.

23	Review 20% of the Condition Reports closed since January 1, 1995 which are associated with PSA safety significant systems for degraded equipment operability issues to ensure that we have adequately identified and dispositioned operability issues. This has been expanded to a 100% review of PSA safety significant systems.	In closeout verification process.
24	Complete an additional Outage Safety Review for the startup phase of the outage.	One will occur 7-10 days prior to core loading.
25	Conduct an integrated review of all outage licensing commitments (50.59's, enforcement conference items, Technical Specification Change Requests, and Reload Safety Analysis). Ensure all requirements are met.	Review of licensing documentation in progress.
27	Test all EDGs in accordance with revised ORT-3 and DCS-3.1.11. Return the electrical systems to normal alignment prior to leaving cold shutdown.	Reviewing ORT-3 documentation.
28	Resolve the containment penetration commitments, including: <ul style="list-style-type: none">• CP-32 (Containment penetration for Auxiliary Charging line).• Penetration thermal relief issue.	In progress.
29	Complete a 50.59 evaluation for the existing CCW supply to the RCP seals as a safety function.	Re-opened. Does not appear that a 50.59 is an appropriate vehicle to do this. Considering alternatives.
30	Update the diesel generator loading calculation N-91-016 to properly reflect the loading of the Containment Fan Coolers.	In progress.
31	Evaluate the adequacy of coordination on the 120 VAC instrument bus system through a 50.59 or operability review.	In closeout verification process.
32	Implement interim improvements for the Condition Reporting process, based on a review of assessments and identified recommendations for improving that process.	In closeout verification process.
34	Upgrade Unit 2 operations checklists to include requirements for initials, time, and date. During the review, verify that the checklists are technically correct.	In progress.
36	Revise NP 8.1.1, Work Order Processing, and NP 8.1.3, Post-Maintenance Testing to ensure post-maintenance testing, operability testing, and surveillance test requirements are properly addressed.	In progress.
38	Modification 96-033 - replace control power transformers on Motor Control Centers 2B32 and 2B42.	Awaiting PMT.
39	Modification 90-048 - replace Boric Acid and Reactor Makeup Water totalizers, replace the CVCS control switch, replace flow indicators, and refurbish flow controllers. This resolves an Operator workaround issue.	Awaiting PMT.

40	Modification 94-097 - remove six RCS loop drain valves.	Awaiting PMT.
44	Modification 96-065B - seismically upgrade the Refueling Water Storage Tank recirculation line.	In progress.
45	Modification 96-054 - install pressure gauges in the service water return header from the Emergency Diesel Generator GO1 and GO2 glycol coolers, and reset the throttle valves in that line.	Work is scheduled.
48	Modification 96-068B - eliminate containment heating steam and condensate return containment isolation valves.	In progress.
49	Modification 96-053 - replace an elbow in the west service water header.	In closeout verification process.
50	Modification 95-070 - seismically upgrade the containment cooling fans and filters.	In closeout verification process.
53	Modification 94-095 - replace 8 Main Steam Condenser steam dump valves with improved design.	Awaiting PMT.
54	Modification 95-029 - replace SI accumulator level transmitters.	Awaiting PMT.
56	Modification 96-063 - replace 345 KV breakers (3-4, 4-5, and 142).	Awaiting PMT.
58	Modification 95-058*O - repair Steam Generator intermediate leg supports. This may be resolved through analysis.	Awaiting PMT.
61	Work Orders 9613568 and 9613569 - provide bonnet pressure locking relief for the SI-857A and SI-857B valves (interface valves between RHR and High Head SI) on Unit 2.	Awaiting PMT.
62	Work Order 9611757 - correct the leakage which leads to boric acid buildup in the cylinder blocks of "B" Charging Pump.	Awaiting PMT.
63	Work Order 9603532 - repair the handswitch for 2P-2A, the "A" Charging Pump.	Awaiting PMT.
64	Work Orders 9611624 through 9611626 - replace existing pneumatic turbine generator circuitry time delay relays with plug-in, electronic time delay relays.	Work is scheduled.
67	Work Orders 9611198 and 9611199 - repair the body-to-bonnet boric acid leak on CV-307 B (lowside tap for "B" RCP #1 seal d/p) and CV-308B (lap seal d/p for "B" RCP).	Awaiting PMT.
68	Repair valve AR-3511 per Work Order 9513340. The Unit 2 priming air ejector is blank flanged due to air in-leakage through the condenser air removal isolation valve, AR-3511.	Awaiting PMT.
69	Repair the drain valve for the heating steam moisture separator per Work Order 9613451. The Unit 2 heating steam moisture separator level has been difficult to maintain during normal operations, and frequent alarms were received due to low level. This will be tested following Unit 2 startup.	Work is scheduled.
71	Repair MS-249, the Unit 2 steam line sample valve, per Work Order 9603128. The valve had a packing leak which required steam header sampling to be shifted to the B steam header.	Awaiting PMT.
72	Repair alarm switch 2LS-2511 per Work Order 9605711. The Unit 2 D MSR level was being maintained low in the band due to level oscillations and a steam leak from the alarm switch.	Awaiting PMT.

73	Repair 2P116, the Unit 2 Boric Acid Recirculation Pump, per Work Order 9603130. It has a significant seal leak.	Work is scheduled.
77	Complete the procedure changes and training associated with the new Technical Specification on ECCS regarding the new Containment Integrity Analysis.	In progress.
78	Communicate specific expectations regarding AFW and EDG status control to Operators.	In progress.
79	Restore a proceduralized capability to operate the Containment Spray Pumps in the recirculation mode of the ECCS.	In progress.
80	Obtain amendments requested by Change Requests 188 and 189 related to Steam Generator replacement; 192 related to Service Water operability; and 194 related to Low Temperature Overpressurization limits. This will include resolution of issues related to Control Room and offsite dose evaluations for the analyzed events.	In progress.
81	<p>Submit the following requests for license amendments resulting from the review of existing Technical Specification interpretations:</p> <ul style="list-style-type: none"> • Revise the maximum acceptable power level when crossover steam dumps are inoperable (TS 15.3.4.E). • Revise requirements for offsite power lines availability to address adequacy (TS 15.3.7.A.1.a). • Remove allowances in TS 15.3.1.A.1.a for single reactor coolant pump operation. • Appropriately modify the minimum required boron concentration in the Refueling Water Storage Tanks. 	In progress.

CLOSED ITEMS

Commitment ID Number	Description
3	Walkdown all accessible Unit 2 and common systems for outstanding work order tags. Note: The scope was expanded to include all accessible Unit 1 systems.
4	Conduct as-built inspections of the electrical and I&C components on the Unit 2 CVCS and CCW systems (Work Orders 9607322, 9611140, 9606548, and 9611139).
5	Complete Work Orders 9513222 through 9513225 to conduct inspections of Appendix R alternate power transfer switches.
6	Complete Work Order 9604151 to perform foreign material exclusion inspections on the Unit 2 4160V safeguards bus 2A-06 and breakers.
7	Complete a review of Unit 2 administrative controls implementing or referencing Technical Specifications to ensure Technical Specification requirements are appropriately reflected in the administrative controls.
8	Review 20% of the Operations Technical Specification, Inservice Test, and Operations Refueling Test related surveillance procedures, with concentration on those involving major equipment. Upgrade as necessary to include appropriate initial conditions, return to service lineups, properly specified independent verification, reviewing acceptance criteria, and Technical Specification implementation.
9	Review the In Service Testing (IST) acceptance criteria for the remaining IST pumps to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Make any changes necessary as a result of this review.
10	Review the In Service Testing acceptance criteria for all IST valves to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Complete necessary operability evaluations, revise procedures, and resolve Unit 2 equipment discrepancies.
11	<p>Complete the following regarding installed instrumentation used in the IST program:</p> <ul style="list-style-type: none"> • Identify the Unit 2 installed instruments used in the IST program. • Review the performance of the identified instruments over the last 3 years. • Review the suitability of the instrumentation for use in the IST program. • Review all IST pump hydraulic data over the past year for adverse trends. <p>As necessary, make changes as a result of these actions.</p>
12	<p>Review 20% of the surveillance procedures associated with safety significant non-pump and valve components (such as heat exchangers and fans) to ensure that the surveillance acceptance criteria satisfy the requirements of the plant design basis/accident analysis. Make changes as necessary as a result of this review.</p> <p>Note: This has been expanded to a 100% review.</p>

13	Review other operating procedures that contain maintenance activities and revise as necessary to ensure PMT and QC are properly addressed by those procedures.
15	Review 20% of the work orders performed since January 1, 1995 on Unit 2 or common PSA safety significant systems (AFW, SW, EDG, IA, 4.16 kv, gas turbine, and CCW) to verify adequate PMT was performed to ensure system/component safety function.
16	Complete all Unit 2 Maintenance Rule related work order post-work, pre-PMT reviews prior to the approach to criticality.
26	Revise ORT-3 and DCS 3.1.11 to ensure Technical Specification 15.4.6.A.2 testing includes dynamic loading of the EDG with sequenced loads.
33	Implement interim improvements for the 50.59 process to require that all screenings be either authored or reviewed by a member of the multi-disciplinary review team.
35	Revise applicable IST program documents to prevent equipment from being returned to service (declared operable) with vibrations in the alert range.
37	Include return to service testing in the plant schedule, both outage and nonoutage.
41	Modification 92-141 - relocate the RHR flow control valve controllers on 2CO3 for human factoring.
42	Modification 96-073 - seismically upgrade CCW, SI, RHR, and RHR/letdown piping supports and remove an AFW snubber.
43	Modification 94-066 - install a soft seat in containment isolation valve 2SI-834D, and add a relief valve and pressure regulator in the nitrogen supply line to the SI accumulators. This resolves an Operator workaround issue.
46	Modification 96-022 - install a new 125 VDC feed to 480V safeguards bus 2B03.
47	Modification 94-055 - add seismic supports to the raceway between risers 56 and 62 on C04 (Reactor and Primary Plant Control Board).
51	Modification 96-026 - install, delete, and modify supports for feedwater, main steam, and SI system piping for the 79-14 project.
52	Modification 96-058 - move Power Plant Computer System alarms to the exterior of C-20 panels.
55	Modification 95-035 - modify Containment Spray additive tank controller circuit.
57	Modification 96-069 - replace four breakers (1Y-06-01, 1Y-06-03, 1Y-06-05, and 1Y-06-11) associated with instrument bus 1Y-06.
59	Modification 96-070 - replace molded case circuit breakers associated with instrument buses 2Y-05 and 2Y-06.
60	Work Orders 9601506, 9602502, 9603921, 9611267, 9611278, and 9611755 - replace proximity switches and targets with an improved design and overhaul the Fuel Transfer Cart to enhance control system operation. This resolves an Operator workaround issue.
65	Work Order 9606626 - reinstall switches on the Unit 2 Containment hatch third door to allow monitoring of door status.
66	Work Order 9611052 - replace the 2P-10B switch, the "B" RHR Pump control switch.
70	Install a new level control system for the brine tank (T-118) per Modification 92-008*Q. The tank overflows because the installed automatic level control system is not effective, and there is no high level alarm for the tank.

74	Each operating crew will receive simulator training to gain proficiency in casualty response, the expected response of the newly installed steam generators and reactor core, and placing the turbine on-line.
75	Revise the initial and requalification operator training plans to include a review of the administrative procedures identified as significant to daily operation of the plant during each two year operations training plan.
76	Conduct roundtable discussions with all MSS\SS\DTA personnel regarding conservative decisionmaking, Technical Specification interpretations, and lessons learned from recent regulatory communications and perspectives. Review outlier Technical Specification interpretations for interim applications.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 1

Commitment Description: Complete a detailed Unit 2 Containment Materiel Condition Assessment, addressing housekeeping, system walkdowns, materiel condition, and instrumentation. Extensive work inside Containment was conducted this outage due to the Steam Generator replacement project, so this warrants increased scrutiny during Containment closeout.

Should this assessment identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the assessment will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the assessment defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Restart Issues Coordinator:
 - A summary of the scope of the materiel condition assessment and when it was conducted (report using the NUTRK system - NUTRK U2R22 RESTART Action # 1).
 - A copy of documentation used to conduct the assessment.
 - A summary which addresses significant items/issues identified during conduct of the assessment and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 1).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the assessment are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

Draft independent review did not identify any discrepancies.

Status:

This commitment addresses the conditions of systems and components inside Unit 2 containment. This is being accomplished through 4 mechanisms:

- The thorough inspection for materiel condition and operational readiness as part of the proceduralized, normal startup sequence (using Checklist 20).
- Steam Generator Replacement Project walkdown and closeout of containment. This has been completed.
- Sargent and Lundy's detailed walkdown of the Instrument Air System. This has been completed.
- Use of the System Restoration Procedure (NP 2.3.4), which formalizes a systematic approach to restoring 28 systems following extensive work and outages. Most walkdowns were completed once earlier this year, and they are currently being done again due to the delay in the outage.

The following walkdowns per NP 2.3.4 have been completed (follow-up documentation not yet completed though):

IA	SW	VNCC	Y120AC
Containment	FH	RHR	Nuclear Instrumentation
CVCS	RC	SI	125DC
4.16KV	AF	DG	480VAC
ESF	EH	DA	Rod Drive
CC	MS	CS	

The following walkdowns per NP 2.3.4 will also be completed:

RP	TU	SG	Structures	Computers
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Identified discrepancies are being resolved through the Condition Reporting and work order processes.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 2

Commitment Description: Walkdown all accessible Unit 2 and common Maintenance Rule systems for adequate visual materiel condition.

Should these walkdowns identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the walkdowns will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the walkdowns defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Restart Issues Coordinator:
 - A summary of the scope of the walkdowns and when they were conducted (report using the NUTRK system - NUTRK U2R22 RESTART Action # 2).
 - A copy of documentation used to conduct the walkdowns.
 - A summary which addresses significant items/issues identified during conduct of the walkdowns and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 2).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the walkdowns are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

During walkdowns by the Independent Reviewer, some obvious adverse conditions were noticed (which the reviewer will follow up on to ensure that they are recognized within the corrective action systems at PBNP).

- The RHR Pump and Motor (2P-10B) have several maintenance tags hung locally which identify work activities (like an oil change) which do not appear to be on the prerequisite list for fuel load.
- One of the Component Cooling Pumps from Unit 2 has been scavenged for use in Unit 1. Replacement of the Unit 2 pump is being tracked by the PBNP staff. One additional adverse condition observed on the 'A' Steam Generator was where the Auxiliary Feedwater line connects to the Main Feedwater line. The Auxiliary Feedwater line appears to need more rigid support similar to the arrangement that exists on the 'B' Steam Generator. This condition is being pursued by the PBNP staff.

Status:

72 systems have been identified which are in the scope of the Maintenance Rule, and this commitment is being accomplished through two means:

- 28 Maintenance Rule systems are being walked-down using the System Restoration Procedure (NP 2.3.4) outside containment. Most walkdowns were completed once earlier this year, and they are currently being done again due to the delay in the outage. 23 walkdowns have been completed, and the remaining walkdowns are scheduled.
- The Maintenance Rule portions of the 44 remaining Maintenance Rule systems are being independently walked-down by Engineering and Operations for visual assessment of materiel condition. 14 have been completed, and the remainder are scheduled to be completed late the week of April 28.

Identified discrepancies are being resolved through the Condition Reporting and work order processes.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 3

Commitment Description: Walkdown all accessible Unit 2 and common systems for outstanding work order tags.

Should these walkdowns identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the walkdowns will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

The independent review recommended that clear guidance be provided for these work order tag improvements, both in the form of the governing procedure (NP 8.1.1) and expectations being clearly specified to the workers.

The independent review concluded that there are no items associated with this commitment, other than those covered in the Condition Reports generated from this activity, which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 4

Commitment Description: Conduct as-built inspections of the electrical and I&C components on the Unit 2 CVCS and CCW systems (Work Orders 9607322, 9611140, 9606548, and 9611139). This will ensure that the associated drawings will be accurate.

Should these as-built inspections identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the as-built inspections will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Independent Review Results:

No problems noted. The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 5

Commitment Description: Complete Work Orders 9513222 through 9513225 to conduct inspections of Appendix R alternate power transfer switches.

The inspections will determine whether an E shaped retaining ring on the arcing contact assembly of some ASCO switches is missing. Condition Report 95-602 documents the missing E clip issue. Seismic qualification testing has shown that the switches pass the baseline functional testing even without the E shaped retaining rings installed.

Should these inspections identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the inspections will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

No problems noted. The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 6

Commitment Description: Complete Work Order 9604151 to perform foreign material exclusion inspections on the Unit 2 4160V safeguards bus 2A-06 and breakers. Debris found in switchgear prompted these inspections.

Should these inspections identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the inspections will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Independent Review Results:

There was no independent (QC) verification for the FME closeout inspection. This is not a requirement of NP 8.4.10, but may be warranted in cases of closeout inspections of critical equipment. QC had properly reviewed the Work Plan. PBNP should consider addressing in NP 8.4.10 as to conditions where verification is warranted for FME closeout inspections.

The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

There is a great deal of work to be done in the future.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 7

Commitment Description: Complete a review of Unit 2 administrative controls implementing or referencing Technical Specifications to ensure Technical Specification requirements are appropriately reflected in the administrative controls.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This commitment is also a subset of Enforcement Conference Commitment Item # 3.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

The independent review identified the following from a review of 46 Technical Specification Tests, 16 Inservice Tests, and 12 Operations Refueling Tests:

- Technical Specification section is not identified in the procedure's PURPOSE section (4 instances).
- Incorrect Technical Specification section is identified in the procedure's PURPOSE section (4 instances).
- Additional Technical Specification sections should be added in the procedure's PURPOSE section (21 instances).

The independent review recommended:

- Revising the procedures to address the identified discrepancies (NUTRK U2R22 RESTART Action # 93).
- Determining the root cause of these discrepancies.
- Maintaining the database which cross-references procedures to the Technical Specifications.

The independent review concluded that, except for resolving some of the Condition Reports generated from this activity, there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 8

Commitment Description: Review 20% of the Operations Technical Specification, Inservice Test, and Operations Refueling Test related surveillance procedures, with concentration on those involving major equipment. Upgrade as necessary to include appropriate initial conditions, return to service lineups, properly specified independent verification, reviewing acceptance criteria, and Technical Specification implementation.

The population considered for this commitment will be the Unit 2 and common Operations Technical Specification, Inservice Test, and Operations Refueling Test related surveillance procedures.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

The Restart Issues Coordinator will work with the Responsible Person to ensure the sampling methodology creates a 20% population which is both random and representative of the entire population.

This commitment is also a subset of Enforcement Conference Commitment Item # 17.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

The independent review identified specific procedural enhancements from a review of 6 Technical Specification Tests, 16 Inservice Tests, and 12 Operations Refueling Tests.

The independent review recommended:

- Addressing the identified procedural enhancements.
- Adopting a system review of procedures to better ensure consistency of procedures within each system.

- Providing guidance to procedure reviewers to maintain consistency.

The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Revisions were made to one Operations Technical Specification, 9 Inservice Test, and 4 Operations Refueling Test related surveillance procedures.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 9

Commitment Description: Review the In Service Testing (IST) acceptance criteria for the remaining IST pumps (CCW, Charging, Boric Acid Transfer, CR Chill Water, CSR Chill Water, SFP Cooling, and FO Transfer pumps) to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Make any changes necessary as a result of this review.

The work has already been completed for the SI, RHR, AFW, SW, and Containment Spray pumps (the original group), so they are not included in this commitment.

The scope of this review will be ensuring that the IST acceptance criteria meets the design basis/accident analysis requirements. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This commitment is also Enforcement Conference Commitment Item # 39.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

The CCW operability determination states that test flow for IT-12 and IT-13 is 3600 gpm. IT-13 sets mean average flow at 3500 gpm. The operability determination is still valid on this point, since IT-13 flow is greater than the required design basis flow of 3457 gpm (this value includes instrument uncertainty). It is noted, however, that the recommendation of the operability determination is to set flow at greater than the design basis flow. IT-13 is therefore in compliance with this recommendation. IT-12 is currently being revised and should be similarly reviewed when issued. Ultimately, the procedure flow value should be revised to match the operability recommendations (setting flow at greater than the design basis flow, with instrument uncertainty included), instead of the current procedural flow setting of 3500 gpm.

The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 10

Commitment Description: Review the In Service Testing acceptance criteria for all IST valves to ensure that the IST acceptance criteria meets the design basis/accident analysis requirements. Complete necessary operability evaluations, revise procedures, and resolve Unit 2 equipment discrepancies.

The scope of this review will be examining the associated documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This commitment is also Enforcement Conference Commitment Item # 40.

Completion Timing: This will be completed prior to January 17, 1997. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

The independent review concurred with the recommendation of Point Beach Memo 97-0036 that although the scope of this commitment has been satisfied, further (Phase 3) evaluation should be completed in order to prevent further questions if a valve would fall outside of its preliminary design time. It would be prudent and proactive to continue such an effort.

The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

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Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 11

Commitment Description: Complete the following regarding installed instrumentation used in the IST program:

- Identify the Unit 2 installed instruments used in the IST program.
- Review the performance of the identified instruments over the last 3 years.
- Review the suitability of the instrumentation for use in the IST program.
- Review all IST pump hydraulic data over the past year for adverse trends.

As necessary, make changes as a result of these actions.

Should these reviews identify either generic issues or significant discrepancies which could negatively impact reactor safety; the scope of the reviews will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This commitment is also Enforcement Conference Commitment Item # 43.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

The independent review recommended that a streamlined database be established to verify that current IST instrumentation is appropriate and possesses sufficient reliability in fulfilling its design function. It should be evaluated on a periodic basis.

The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Appendix: Texts Results

The first part of the appendix contains the results of the analysis of the texts of the different groups. The results are presented in the form of a table, which shows the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category.

The second part of the appendix contains the results of the analysis of the texts of the different groups, which are presented in the form of a table, showing the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category.

The third part of the appendix contains the results of the analysis of the texts of the different groups, which are presented in the form of a table, showing the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category. The results are presented in the form of a table, which shows the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category.

The fourth part of the appendix contains the results of the analysis of the texts of the different groups, which are presented in the form of a table, showing the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category.

The fifth part of the appendix contains the results of the analysis of the texts of the different groups, which are presented in the form of a table, showing the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category.

The sixth part of the appendix contains the results of the analysis of the texts of the different groups, which are presented in the form of a table, showing the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category.

The seventh part of the appendix contains the results of the analysis of the texts of the different groups, which are presented in the form of a table, showing the number of texts in each group, the number of texts that are classified as 'good', 'bad' or 'neutral', and the percentage of texts in each category.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 12

Commitment Description: Review 20% of the surveillance procedures associated with safety significant non-pump and valve components (such as heat exchangers and fans) to ensure that the surveillance acceptance criteria satisfy the requirements of the plant design basis/accident analysis. Make changes as necessary as a result of this review.

The population considered for this commitment will be the Unit 2 and common surveillance procedures associated with safety significant non-pump and valve components (such as heat exchangers and fans).

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

The Restart Issues Coordinator will work with the Responsible Person to ensure the sampling methodology creates a 20% population which is both random and representative of the entire population.

This commitment is also Enforcement Conference Commitment Item # 47.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

As a program enhancement, it was recommended that the PBNP staff evaluate the need to periodically verify that the Residual Heat Removal Heat Exchangers (2HX-11A/B) can perform at the design heat duty of 24.15 E6 BTU/HR (FSAR Table 6.2-7) (NUTRK U2R22 RESTART Action # 94).

The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Due to discrepancies identified during the initial 20% review, the scope of this review was expanded. All surveillance procedures (Unit 1, Unit 2, and common) associated with safety significant non-pump and valve components (such as heat exchangers and fans) were reviewed to ensure that the surveillance acceptance criteria satisfy the requirements of the plant design basis/accident analysis.

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 13

Commitment Description: Review other operating procedures that contain maintenance activities and revise as necessary to ensure PMT and QC are properly addressed by those procedures. This will be done for Unit 2 operating procedures.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This commitment is also Enforcement Conference Commitment Item # 51.

Completion Timing: This will be completed prior to January 31, 1997. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

In OM 3.20, "MOV/AOV Operation and Maintenance" some guidance for PMT's is provided when adjusting packing on an MOV. This guidance recognizes the challenge to operability for an MOV when packing is tightened, but does not prohibit this activity. To address operability following a packing adjustment on an MOV, OM 3.20 indicates the valve should be cycled if plant conditions permit. It does not appear to provide guidance on what to do following packing adjustments on MOV's which cannot be cycled. For safety related MOV's, this could lead to an operability issue.

Additionally, OM 3.20 addresses operator action to manually seat an MOV. In section 3.3.4, the guidance, like the guidance for the packing adjustment, appears to be deficient in that it does not prevent an operator from manually closing the MOV with excessive torque and causing the MOV to be inoperable.

As a result of this independent review, errors, omissions, and sometimes inconsistent application of PBNP criteria have been discovered. Examples include:

- No PMT steps to test the function of valve blocks (at installation and/or removal).

- No PMT steps to test the setting of alarm setpoints.
- Inconsistent application of the PMT criteria.
- No PMT steps to leak check test rigs when connecting them.
- No PMT steps to leak check water box manways after installing covers.
- Instances of need for torque designations in the procedures.
- Installing and removing a filter skid using flanges with flexitalic gaskets with no PMT/QC identified.
- Installing a strainer cover with no PMT/QC identified.
- Installing an air jumper without a PMT.

It is this reviewer's judgment that most of the procedure changes made to resolve this commitment describe actions within the skill of the operator. These actions can be performed without the need for specific procedure steps and without adversely affecting nuclear safety or the safe operation of the plant. The following actions should be completed prior to the restart of Unit 2:

- Improve the operator guidance on MOV/AOV packing adjustments and manual closure to stop seat leakage. The improved guidance should provide sufficient limitations to avoid manipulation of the valve to the extent that it makes it inoperable.
- Resolve the use of a QC witness as an apparent replacement for qualified individuals to perform flange and torquing work requirements. This can be accomplished by using qualified people to perform the initial work item and use QC as a second verification only where necessary.

Other actions relative to this commitment which are considered long term enhancement issues that should not impede restart are the following:

- Improve the Auxiliary Operator job functions description in OM-2.6, to more completely describe the expectations for maintenance activities and the need for and relative safety significance of any required Post Maintenance Testing.
- Train the Auxiliary Operators on these expectations and their relative safety significance.
- Address the expectations in the implementing procedures in a manner that clearly improves the safe performance of the procedure. This effort should balance the need for specific procedure wording with the skills of the operator and the relative safety significance of the evolution.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 14

Commitment Description: Review equipment return to service testing requirements prior to the following U2R22 mode change readiness reviews to ensure the required equipment is operable prior to changing the following modes: core reload, leaving cold shutdown, and the approach to criticality.

Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This commitment is also Enforcement Conference Commitment Item # 53.

Completion Timing: This will be completed approximately one week prior to core loading, prior to leaving cold shutdown, and prior to the approach to criticality.

Criteria to Closeout This Item:

1. Completion of the three reviews defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Enforcement Conference Commitments Coordinator which addresses (report using the NUTRK system):
 - When the reviews occurred.
 - Copies of documents used to perform the reviews.
 - Results of the reviews.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.
3. The Restart Issues Coordinator or the Enforcement Conference Commitments Coordinator have verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Enforcement Conference Commitments Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the reviews are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

(not yet drafted)

Status:

The readiness reviews will occur shortly before each of the three major mode changes (core loading, ~~leaving cold~~ shutdown, and the approach to criticality). These reviews are scheduled activities in the Major Item Work List and are "predecessors" to each plant condition.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 15

Commitment Description: Review 20% of the work orders performed since January 1, 1995 on Unit 2 or common PSA safety significant systems (AFW, SW, EDG, IA, 4.16 kv, gas turbine, and CCW) to verify adequate PMT was performed to ensure system/component safety function.

Approximately 80% of the work orders at Point Beach Nuclear Plant are maintenance work orders, and the original commitment focused on maintenance work orders alone. The scope of this review has been expanded to address the non-maintenance work orders also.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

The Restart Issues Coordinator will work with the Responsible Person to ensure the sampling methodology creates a 20% population which is both random and representative of the entire population.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Independent Review Results:

WO 9501025 - This work order was written to investigate the excessive loading time of the K-02B Air Compressor. A "pea size" defect on the cylinder wall was identified in the WO package with a note that it could not be removed. The impact of this defect on the operation of the air compressor with respect to excessive loading time was not addressed in the WO package (NUTRK U2R22 RESTART Action # 91).

WO 9506905 - This work order reset the 62/K2A (K2B) time delay relay from 7 seconds to 10 seconds. There is no justification or 50.59 review for the safety significance of this change that is with the WO or with the DCN that changed DWG West. 499B466 SH. 538. Additionally, the relay as found setting was actually 12.1 seconds (not 7 seconds)

and was left at 10.2 seconds. The impact of this as found/as left information was not documented for its impact on compressor operation. DCN 95-1021 for the drawing change references the wrong work order number as justification for the document change (NUTRK U2R22 RESTART Action # 91).

WO 9506768 - This work order repaired tubing connections to DPIS-04007 in the Auxiliary Feedwater System. The work order specified a 2000 psig leak test of the new connections, but a pen and ink changed this leak test pressure to 1400 psig. While this may be the appropriate pressure to perform this leak check, the change is not justified or reviewed for its safety impact within the work order (NUTRK U2R22 RESTART Action # 92).

The independent review concluded that there are no items associated with this commitment which would impede Unit 2 start-up.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 16

Commitment Description: Complete all Unit 2 Maintenance Rule related work order post-PMT (i.e., post-work, pre-PMT) reviews prior to the approach to criticality.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to the Unit 2 approach to criticality.

Independent Review Results:

No discrepancies noted. The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

These reviews occur between the time maintenance is reported complete and when the PMT is actually accomplished (so as to ensure the proper PMT is done for the work performed).

Originally, this commitment was anticipated to remain open through the outage. However, this has been closed based on:

- The results of Restart Commitment #15, which reviewed PMT adequacy.
- The results of this review, where the Responsible Person identified that about 2% of the PMT's required changing, almost all due to changes in the scope of work performed since the PMT had originally been conceived.
- These post-work, pre-PMT reviews are an established process.

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 17

Commitment Description: Review 50.59 screenings conducted in 1996. Upgrade those determined to require a 50.59 evaluation. This will be done for all 50.59 screenings, not just those involving Unit 2.

During November 1996, QA auditors reviewed the 50.59 and 72.48 safety evaluation processes per QA audit A-P-96-17. The auditors reviewed two hundred 50.59 screenings and identified six which required a full 50.59 evaluation and another six which were questionable. None of these were found to involve an Unreviewed Safety Question.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to the Unit 2 approach to criticality. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 17):
 - When the review occurred.
 - How many screenings were reviewed.
 - Documents initiated or changed as a result of this review (this includes 50.59 evaluations). The identification number for each of these must be included in this summary, and a copy of those documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.

3. The Restart Issues Coordinator has verified that the:

- Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
- Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

A review of 50.59 screenings yielded instances where the basis for determining that a 10 CFR 50.59 was not required needed more justification, although the screenings were appropriate. The independent review made the following recommendations:

- The recommendations from QA Audit Report A-P-96-17 should be implemented in a timely manner.
- Current guidance as to whether to use a screening or a 10 CFR 50.59/10 CFR 72.48 safety evaluation is rather broad and subject to interpretation. The safety evaluation applicability threshold should be better specified and training conducted on same.
- Specific examples applicable to everyday 10 CFR 50.59/10 CFR 72.48 preparation should be made available, either in NPB Procedure 10.3.1 and/or in training.
- Technical training with emphasis on style and content should be considered, both for initial qualification and continuing training.
- When the 10 CFR 50.59 applicability process for a particular item is inconclusive, perform a full 10 CFR 50.59 safety evaluation.
- Require that all screenings be either authored or reviewed by members of the multidisciplinary review team.

Status:

The initial review identified 21 screenings which should be upgraded to a full 50.59 evaluation (one was later determined to not require a 50.59 evaluation). Four screenings were to be re-written to add details.

The following four screenings have been rewritten due to having a lack of detail:

- QCR 96-092, Action #3: Review 50.59 screening for SPEED 96-047, RV Head O-Ring retaining screw, 7/25/96. Update screening as necessary to determine if a full evaluation is required.
- QCR 96-092, Action #4: Review 50.59 screening for WO 933149, replace SW-2950, 10/2/96. Update screening as necessary to determine if a full evaluation is required.

- QCR 96-092, Action #5: Review 50.59 screening for RF-60.1 (65.1), Revision 0, Unlatching Tool Calibration, 10/8/96. Update screening as necessary to determine if a full evaluation is required.
- QCR 96-092, Action #6: Review 50.59 screening for RP-4A, Revision 12, 3/15/96. Update screening as necessary to determine if a full evaluation is required.

The following screenings have been upgraded to full 50.59 evaluations:

- QCR 96-092, Action #7: Perform a full 50.59 evaluation for the screening on MR-96-051, supply breaker for 1/2AF-4002 control, 8/15/96.
- QCR 96-092, Action #9: Perform a full 50.59 evaluation for the screening on WO 9411618, Nitrogen Piping and Regulator Replacement, 11/6/95.
- QCR 96-092, Action #19: Perform a full 50.59 evaluation for the screening on MR-218/219, Removal of Rod Insertion Alarms, 7/17/96.
- QCR 96-092, Action #21: Perform a full 50.59 evaluation for the screening on MR-90-047*A, BA + RMW Flow Transmitter Replacement, 2/22/96. **COMPLETING THIS IS A CORE RELOAD PREREQUISITE.**
- QCR 96-092, Action #22: Perform a full 50.59 evaluation for the screening on Replacing 1LC-473F, 7/8/96.
- QCR 96-092, Action #24: Perform a full 50.59 evaluation for the screening on MR-89-133*C, Additional 120V Containment Lighting, 4/2/96. **COMPLETING THIS IS A CORE RELOAD PREREQUISITE.**
- QCR 96-092, Action #28: Readdress screening associated with Safety Injection System Checklist Revision changing SI-826A position (screening date 4/17/96. Perform full 50.59 evaluation.

The following screening was originally felt to require a full 50.59 evaluation, but that decision was later reversed:

- QCR 96-092, Action #14: Perform a full 50.59 evaluation for the screening on Setpoint Change for 125 VDC Breakers, 7/29/96.

The following screenings are being upgraded to full 50.59 evaluations and are scheduled to be completed prior to May 12:

- QCR 96-092, Action #8: Perform a full 50.59 evaluation for the screening on Replacement of Oil Sightglass on G-04, 9/25/96.

- QCR 96-092, Action #12: Perform a full 50.59 evaluation for the screening on SW Control Board Wire Separation, 11/7/96.
- QCR 96-092, Action #13: Perform a full 50.59 evaluation for the screening on Temporary Change to IT-08A, Revision 14, 11/6/96.
- QCR 96-092, Action #15: Perform a full 50.59 evaluation for the screening on MR-96-005, Oil Level Sightglass for P-15A/B, 3/11/96. **COMPLETING THIS IS A CORE RELOAD PREREQUISITE.**
- QCR 96-092, Action #18: Perform a full 50.59 evaluation for the screening on OP-1A, Revision 56, 3/9/96.
- QCR 96-092, Action #20: Perform a full 50.59 evaluation for the screening on FSAR Deletion of Large Pipe Missiles, 3/24/95.
- QCR 96-092, Action #23: Perform a full 50.59 evaluation for the screening on AOP-6F, Revision 0, 12/25/95. **COMPLETING THIS IS A CORE RELOAD PREREQUISITE.**
- QCR 96-092, Action #26: Perform a full 50.59 evaluation for the screening on RP-1A/RMP-9002-8, 10/12/96.
- QCR 96-092, Action #27: Perform a full 72.48 evaluation for the screening on AOP-8H, Revision 0, 10/7/96.

The following screenings are being upgraded to full 50.59 evaluations and are scheduled to be completed after May 12:

- QCR 96-092, Action #10: Perform a full 50.59 evaluation for the screening on Blowdown Evaporator Piping Replacement, 5/4/96.
- QCR 96-092, Action #11: Perform a full 50.59 evaluation for the screening on MR-96-052, AFW MOV Fuse Installation, 8/15/96.
- QCR 96-092, Action #16: Perform a full 50.59 evaluation for the screening on AM 3.3, Primary to Secondary Leakage Monitoring, 2/8/96.
- QCR 96-092, Action #17: Perform a full 50.59 evaluation for the screening on OP-3C, Revision 64, 3/9/96.
- QCR 96-092, Action #25: Perform a full 50.59 evaluation for the screening on OP-6A, Revision 17, 12/22/95.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 18

Commitment Description: Review outstanding JCOs. Perform operability determinations and 50.59 evaluations needed to address the issues. This applies to all outstanding JCOs, not just the ones associated with Unit 2.

The scope of this review will be examining the outstanding JCOs for accuracy and compliance with requirements. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 18):
 - When the review occurred.
 - Which specific JCOs were reviewed.
 - Documents initiated or changed as a result of this review (including operability determinations and 50.59 evaluations). The identification number for each of these must be included in this summary, and a copy of those documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

A dispositioned closed JCO (JCO 96-01) was discovered to have unresolved questions in the documentation that closed JCO 96-01. SER 97-003, dated 1/6/97, replaced and cancelled JCO 96-01 with the conclusion that the "Condition of SW Boiling / Voiding in Containment Fan Coolers During Transients" is not an Unreviewed Safety Question because the NRC accepted the "interim operability criterion" described to them in VPMPD (letter) 96-065. This WEPCO correspondence to the NRC titled "Detailed Operability Evaluation of the Service Water System with respect to Post-Accident Boiling in Containment Fan Coolers Point Beach Nuclear Plant, Unit 1 and 2", concluded that the water hammer loads exceeded code allowable values, but that piping code operability was validated by code allowable criteria for interim operability. Letter VPMPD 96-065, dated 9/9/96, also concluded that the incremental increase in risk, as determined by the PBNP PSA, was not significant for a period of 14 months. VPMPD 96-065 indicated that corrective actions, based on this interim 14 months of acceptable risks, would be planned for the scheduled refueling outages in 1997. The questions left unresolved by the above actions and correspondences center around the existence of a condition that is an interim operability determination, and how the time clock associated with the interim determination is understood and tracked to resolution by the licensee. In the context of Restart Commitment No. 18, the answers to these questions would supposedly be found in the documentation of a Justification For Continued Operation. Since the technical issue with the fan cooler water hammer is now labeled as an " Interim Safety Evaluation Report", these questions appear unresolved.

Status:

This is in progress.

There are two outstanding JCOs:

- JCO #94-03 - involves DC Molded Case Circuit Breakers. A 50.59 is being written to address this. There was one operability issue identified with wire separation which could impact molded case circuit breakers. That operability issue is being dispositioned through the C² and operability determination processes.
- JCO #94-07 - involves the Containment Accident Fan motor unshielded bearings. A 50.59 evaluation is being written to address this.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 19

Commitment Description: Conduct a review of 50.59 evaluations from this outage. Ensure all conditions of the evaluations have been completed. This review will address the 50.59 evaluations for Unit 2.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 19):
 - When the review occurred.
 - A listing of the 50.59 evaluations which were reviewed.
 - Documents initiated or changed as a result of this review. The identification number for each of these must be included in this summary, and a copy of those documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.
 - Results of the review.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.

3. The Restart Issues Coordinator has verified that the:

- Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
- Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

No discrepancies noted to date.

Status:

This review is in progress. There are two aspects of this:

- All 50.59 evaluations approved since January 1, 1996 have been reviewed to identify the outage related population.
- Emergent 50.59 evaluations are being reviewed to identify additional commitments, which will be tracked to completion through the outage.

As this is a continuous process, the scheduled completion date for this commitment will coincide with the approach to criticality. Attached is a spreadsheet of the commitments identified from this review.

50:59 Number	Reviewed	Title of 50:59 (For those Associated with Commitments)	Commitments Made	CODE	STATUS
97-013	SH	CL-1B, "Containment Integrity - Unit 2," CL-9D, "Demineralized Water System," and Change to FSAR Figure 5.2-12a	Prior to setting containment, revise the following documents: 1. CL-1B "Containment Integrity, Unit 2" 2. CL-9D, "DI Water System" Also change "FSAR Dwg 5.2-12a"	CONT	Changes Made: CL-1B 2/11/97 OA 2530 CL-9D 3/3/97??
96-098	SEG	MR 93-025*A, C-01 and 2C-03, AFW pump P-38A MCB Train Separation Rewire	1. Work Plan will be completed during U2R22, before Unit 2 is taken critical 2. Circuit testing will be performed.	CRIT	Complete. P38A = OA 3909 P38B = OA 3931 PMT = IT-10 OA 2805A
96-106	SEG	MR 93-025A, C-01, C-02, Rerouted MCB wiring to provide train separation for CARCS Fans 2W-1A1 and 2W-1D1.	1. The work activities will be performed with the associated Unit 2 in cold shutdown.	CSD	Complete. W1A1=OA 3913, W1D1=OA 3923 Awaiting TS-34 for PMT
97-012	RJP	Diesel Cooler Outlet Service Water Throttle valves	1. New Press gages install 2. Revise fig 2 OI-70, OI-70 and PBF 2067a&b, TS82/81 3. Brief isolation of SW to IA when used 4. Perm gage future 5. Ops WO's set valves, limit DP, Diesels/SW operable, validate fig 6. DCS3.1.7- 3 SW pmps needed	CSD	1. MR96-054*A - 5/12/97 plan start 2. 3. 4. 5. WO 9611750 & 9611751 6. Committed to DCS till TSCR 192 approved
97-018	SH	Main Feedwater Bypass Control Valves (2CS-480,481) Trim Replacement	1. Installed and tested in Cold Shutdown (Stroke testing, stroke timing, leakage & functional testing) 2. Final acceptance testing during unit startup	CSD	Installation pending. CS-480 = OA 8193 CS-481 = OA 8179 PMT = ICP-5.11 OA 3562A
97-019	SH	Component Cooling Pump Replacement	1. During the switchover, separate train powered pumps will be maintained. 2. Precautions will be taken to ensure that the work on the out of service pumps does not effect the running pumps.	CSD	Complete. OA 2022H PMT = IT-12 OA 1751C
97-024	SH	Verification of Containment Pressure ESF Test Switches Continuity before leaving CSD (ICP 10.1 Series)	1. Modify procedures to require verifying continuity prior to leaving CSD	CSD	Procedures Issued
97-025	SH	Resupply 2Y11, 2Y21, 2Y31 and 2Y41 from 2Y113 and 2Y114 (MR 97-005*B)	1. Perform SQUG walkdowns on newly installed conduits 2. Modify during CSD with Si blocked 3. Work each cabinet sequentially 4. DTO Supply breakers on 2Y01-2Y04 prior to re-powering 2Y11-2Y41	CSD	Installation complete. OA's 1194, 1195 Awaiting PMT = OA 1315
97-036	RJP	G03/04 Bearing Insulation	1. IWP to control installation while EDG is OOS per Tech. Spec.	CSD	Work Complete OA1169 and TS-83/84
97-054	RJP	G01/02 Overcurrent protection	1. Completed prior to heatup. 2. Diesel OOS per Tech. specs. 3. Current Mod. design resulted in USQ - design will be changed to address this	CSD	Revised design in progress
97-057	RJP	Unit 2 Loop A channel head duct supports	U2 must be in cold shutdown for MR 97-022	CSD	MR 97-022 modifies supports while unit 2 CS
?	RJP	Overpressurization issue on RHR 700 to 701 (50.59 coming)	U2 must be defueled John Oswald working on this	DEF	

5/1/97

50:59 Number	Reviewed	Title of 50:59 (For those Associated with Commitments)	Commitments Made	CODE	STATUS
96-062	SH	Removal of Reactor Coolant Valves 2RC-503, 541, 543, 558, 598, 599	1. Rx Vessel defueled for installation 2. RCS Vented to atmosphere 3. VT, PT, RT, Pressure & Leakage tests performed following installation	DEF	Complete. RC-503, 541 = OA A3310 RC-558, 598, 599 = OA B3310 RC-543 = OA A2315 Awaiting IT-235 (Outage Activity 2630) & TS 15.4.3 for PMT
96-100	SEG	MR 93-025*A, Revise MCB wiring to provide control circuit separation for 2SW-02907.	1. The work activities will be performed with the associated Unit 2 shutdown with the core defueled while the valve is not required.	DEF	Complete. OA 3919
96-104	SEG	MR 93-025*A, C-01 & 2C-03, Reroute MCB wiring to provide train separation for RHR pumps 2P-10A and 2P-10B.	1. Wires will be replaced and rerouted during U2R22. Work will be completed with the core defueled.	DEF	Complete. 2P10A = OA 3907 2P10B = OA 3921 PMT = IT-4A OA 2039
96-115-01	SEG	Change to RP-8, Part 4, "Placing the MSB Transfer Cask (MTC) into the spent fuel pool"	1. Changes in this evaluation related to returning the MSB/MTC to the SFP for an extended period only apply when the U2 core is offloaded during the SGR Outage.	DEF	Updated on 10/11/96
96-116	SEG	RP-1A Preparation for Refueling and RP-1B Recovery from Refueling	1. RP-1A/1B modified to use during U2R22 refueling outage during the defueled phase.	DEF	Updated on 1/31/97, 3/20/97
96-122	SEG	Revise MCB C-01 wiring for train separation for 2SI-850A&B, 2SI-851A&B	1. The work is being performed during U2R22, when the reactor vessel is defueled and RHR operability is not required.	DEF	Completed 2SI-850A/B - OA 3915 Completed 2SI-851A/B - OA 3917 PMT = IT-538 OA 2381
96-130	SEG	Point Beach Nuclear Plant Unit 2 Cycle 23 Reload analysis.	1. Safety evaluation for Unit 2 Cycle 23 core reload.	DEF	Complete - No OA #
97-006	SH	PBTP-047 RHR Pump Maximum Flow Test	1. Test with cavity flooded 2. Test defueled & depressurized 3. No fuel movement during test 4. Both trains tested 5. Pumps closely monitored - ensure not damaged (by Mr Rep) 6. IT-04A done as PMT 7. Can't reload if pump damaged (until fixed)	DEF	Complete - OA 1873
97-009	SH	ORT-3 Revision 28	1. Test U2R22 Defueled 2. Test one train at a time (other kept operable) 3. Ensure P-38A/B running during test 4. Enter appropriate LCOs 5. No other LCOs/ESF work/testing	DEF	Test Complete: Train A = 2/4/97 OA 2450, 2450A Train B = 2/7/97 OA 2450B
97-009-01	SH	Temporary Change to ORT-3 Revision 28	Make the following changes to ORT 3, rev 28: 1. For Train A portion of test, enter an LCO for 1P15A 2. Ensure all A Train LCOs are cleared prior to conducting the B Train test 3. Reset Containment Vent Isolation Ckts during Train A&B tests	DEF	Test Complete: Train A = 2/4/97 OA 2450, 2450A Train B = 2/7/97 OA 2450B
97-015	SH	Repair of SW-00307 Valve	1. Neither unit requires RHR operation for the duration of this repair. 2. CCW HX "D" is out of service 3. SW return header is maintained at a vacuum	DEF	Accepted - OA 8824, 8817B PMT = PBTP-52 OA 698377777777

50:59 Number	Reviewed	Title of 50:59 (For those Associated with Commitments)	Commitments Made	CODE	STATUS
97-022	SH	Repair/Replacement of 6" SW elbows on West SW Header (MR 96-053)	1. Installed w/unit defueled 2. Seismically qualify interim & final configurations 3. Develop contingency plans for SW leakage & loss of SFP cooling 4. All welds NDE'd 5. FME controls (inspect plug, flush shavings) 6. SW-2889 will be closed <7days	DEF	Installation pending - OA's 8817, 8817A 6507, 6855 PMT = 6406B All work complete 4/30/97
97-023-1	SH	Repair/Replacement of 6" SW elbows on West SW Header (MR 96-053)	1. Installed w/unit defueled 2. Seismically qualify interim & final configurations 3. Develop contingency plans for SW leakage & loss of SFP cooling 4. All welds NDE'd 5. FME controls (inspect plug, flush shavings) 6. SW-2889 will be closed <7days	DEF	Installation pending - OA's 8817, 8817A 6507, 6855 Awaiting PMT = OA 6406B All work complete 4/30/97
97-032	SH	MR 96-069"A, "Replace Breakers in 1Y-06"; MR 96-069"B, "Replace Breakers in 1Y-05"	1. Replace w/Unit 2 defueled & Unit 1 in CSD or HSD. 2. Replace breakers sequentially 3. Ops to review list of affected equipment prior to each breaker changeout	DEF	Installation Complete - OA 8888 PMT =
97-033	SH	Test the ability to cycle the Unit 1 to Unit 2 CCW cross connect valves (PBTP-058)	1. Unit 2 defueled 2. No loads requiring Unit 2 CCW 3. Unit 1 shutdown, T>350 degrees 4. Not on Unit 1 RHR 5. RHR system aligned for injection	DEF	Procedure issued 2/28/97 Test completed 3/4/97 OA 1176
96-072	SH	MR 96-022, Re-supply 1B04 & 2B03 DC Control Power	1. Complete during Refueling outage 2. Battery Capacity Test System used for PMT	OUT	Accepted - OA 8912, 8912A PMT is complete
96-086	SEG	IWP 96-022-2, IWP 96-022-3, Re-supply 1B04 & 2B03 DC Control Power	1. Complete during Refueling outage 2. Battery Capacity Test System used for PMT	OUT	IWP 96-022-2 Accepted - OA 8912A PMT is complete IWP 96-022-3 Will work during U1R24
96-087	SEG	MR 94-066"A install soft face disk into 2SI-834D CIV check valve	1. Complete during refueling outage 2. Test in accordance with relief valve program.	OUT	Accepted - OA 8791
96-112	SEG	MR 96-063, Replacement of U2 Generator output breaker 2F52-142	1. The installation will take place with Unit 2 in refueling shutdown & 345 kV bus section 4 deenergized and grounded.	OUT	Installation Complete - OA 7602 Initial Testing Complete - OA 7602 Retest must be after bkr closed onto Grid
96-121	SEG	Install, Delete, & Modify Supports for FW, MS and SI piping	1. These modifications will be installed during U2R22.	OUT	Accepted, OA 8798, 8276, 8022, 8467, 8796
96-127	SEG	2ICP-04.002-1 Reactor Coolant Flow Transmitters, Outage Calibration	1. Recalibrate Unit 2 Reactor Coolant Flow transmitters to account for replacement steam generators.	OUT	Complete - OA 3437
96-134	SEG	Install, Delete, & Modify Supports for AFW, RHR, CVCS and CCW piping	1. These modifications will be installed during U2R22.	OUT	Accepted - OA 8525
97-005	SH	MR 96-065B "U1/U2 RWST Recirc Line Seismic Upgrade"	1. This modification will be completed during U2R22	OUT	Installation complete - OA 1059, 8700
97-022	SH	Modification 96-57, Addition of Relief Valves to Containment Piping Pent	1. Install relief valve to relieve pressure between CV-313 & CV-313A during this refueling outage.	OUT	Installation pending - OA 8207

50:59 Number	Reviewed	Title of 50:59 (For those Associated with Commitments)	Commitments Made	CODE	STATUS
97-022-1	SH	Modificaiton 96-57, Addition of Relief Valves to Containment Piping Pent	1. Install spring check valve to relieve pressure between CV-313 & CV-313A during this refueling outage.	OUT	Installation pending. OA 8207
97-028	SH	MR 97-008 New Charging Pump Flow Gage for IST	1. SHOULD install new flow indicator across FE-128 during U2R22 2. Install as QA, SR, and seismically supported.	OUT	Installation Pending OA's 6862, 3943
96-091-02	SEG	Temp Mod 96-017, 96-018, repair SFP outlet MOV's SW-2930A&B	1. Complete prior fuel motion for Unit 2 1996 refueling outage	PREOUT	Complete. Restored A=9/26/96 B=OA 1650
97-035	RJP	Isolation of BAST from SI suction	1. Revise CL-7A and CL-7B for 1(2) SI-826A from open to shut	Prior to use	Completed previously
97-053	RJP	SLP 3 revised	1. Revise SLP 3 to indicate safe loads over control building and turbine building	Prior to use	In progress
97-010	SH	Preventing EDG Overload During SI Pump Operation when an EDG is Aligned to Supply Emergency Power to both Units	Modify the following Procedures: 1. PBTP-051 2. IT-01 3. IT-02 4. IT-530A 5. IT-530B 6. IT-535A 7. IT-535B 8. IT-780	Prior to Use	Permanent Change: 1. 1/25/97 Temp Changes: 2. 1/31/97 3. 2/8/97 4. 5. 6. 2/13/97 7. 2/13/97
97-011	SH	Temporary and permanent change to IT-06 & permanent change to IT-05, Containment Spray Pumps & Valves (Quarterly) U2 & U1 respectively	Rewrite the procedure to include: 1. Starting CS Pump on Mini-Recirc vs. full flow test line	Prior to Use	Permanent Changes Made: 1/28/97

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 20

Commitment Description: Review items from existing open item lists (e.g., NUTRK) to identify potentially degraded equipment. Other lists which could identify potentially degraded equipment must also be reviewed per this commitment, including informal lists in peoples' desks, etc.

Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to the Unit 2 core loading. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. Each Group Head has informed the Restart Issues Coordinator:
 - That the review described in the "Commitment Description" section has been completed for their group.
 - What potentially degraded equipment was identified from their review (reference a NUTRK identification number, etc. to uniquely identify the document addressing the issue).
3. The Restart Issues Coordinator has:
 - Verified that the Group Heads have reported the data listed immediately above (in item 2).
 - Distributed a listing of the documents reported to him which identify potentially degraded equipment, so that the issues can be addressed.
4. Completion of an independent verification.

Independent Review Results:

From a review of all open NUTRK items through February 24, 1997, potentially degraded equipment issues were identified.

Status:

This review is in progress.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 21

Commitment Description: Review open items from the Design Basis Document development program.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 21):
 - When the review occurred.
 - Which specific open DBD items were reviewed.
 - Documents initiated or changed as a result of this review. The identification number for each of these must be included in this summary, and a copy of those documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).

- Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

The following was noted by the independent review:

DBDOI-50-001

This item needs more explanation. This item does not address other hazards like flooding, missiles, etc. If this information is not available, a condition report may be needed to adequately address the acceptability of this condition. Subsequent to this initial review, DBDOI-50-001 response has been revised and is acceptable.

DBD-12

The last Open Item was closed with CR 94-633. This is a significant issue related to the underperformance of the service water pumps. According to CR 94-633 a prompt operability determination was not done. This open item relates to the hydraulic analysis at the time did not allow any pump degradation. IST allows degradation prior to action being taking. When reviewing the CR 94-633 action item status report, it appears that the correct technical actions were taken.

DBDOI-03-008

Condition report addresses nuclear safety issues only. Additional wear on components may be acceptable; however the need for additional periodic monitoring is not addressed. Also, the potential for a personnel safety issue due the additional wear on this pipe is not addressed. As appropriate, consider documenting that this is or is not a personnel safety issues.

DBDOI-06-004

The valves in this item may be code related if they are protecting code vessels. If they are code related, periodic testing is necessary, and therefore the setpoints must be known. WE should consider evaluating if these are code related, and if so, a condition report may be necessary to track this item.

DBDOI-06-005

The issue documents the missing design information for the nitrogen bottles for the pressurizer PORV's. It appears that there are no known discrepancies for this equipment. However, given the operator preference to use these valves in the EOPs, further analysis may be appropriate. WE should consider determining and validating this information.

DBD-12

In addition, to reviewing the WE open item list, the open items in DBD-12 were reviewed. The DBD had three open items. One item was reviewed during the WE review, and two were closed by Condition Reports.

However, one of the open items in DBD-12 was quite significant and as a result its CR, CR 94-633, was reviewed. This issue relates to the underperformance of the service water pumps. According to CR 94-633 a prompt operability determination was not done. This open item describes that the hydraulic analysis at the time did not account for any pump degradation. IST allows degradation prior to action being taking. When reviewing the CR 94-633 action item status report, it appears that the correct technical actions were taken to revise the analysis over a period of approximately 1 ½ year. However, a prompt determination of operability was not performed. This may indicate further review is necessary in the CR process.

If the DBD Open Item was considered significant at the time, a CR was written and the DBD Open item was closed by the CR, as appropriate. However, the CR processing may have allowed closure without the appropriate operability determination. This is an example of where prompt determination of operability was not addressed by the CR process.

Status:

This is in progress.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 22

Commitment Description: All open operability evaluations for Unit 2 and common equipment will be reviewed for acceptable closure of the degraded equipment issue. Disposition outstanding issues in accordance with 10CFR50.59 and Generic Letter 91-18.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to the Unit 2 approach to criticality. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 22):
 - When the review occurred.
 - Which specific open operability evaluations were reviewed.
 - Documents initiated or changed as a result of this review. The identification number for each of these must be included in this summary, and a copy of those documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).

- Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

According to NP 5.3.7, the "Operability Determinations Notebook", located in the Work Control Center, will contain those Operability Determinations for which "final resolution has not been achieved". In the context of this procedure, the strict interpretation of these requirements would indicate that the "Operability Determinations Notebook" will contain only those determinations not yet completed (and therefore "open" as used in the wording of Restart Commitment No. 22). Because of the time constraints specified in NP 5.3.7, this notebook, by nature, would contain only a few "open operability determinations" still in review for operability. In reality however, this notebook contained about 69 Condition Reports and operability determinations with over half of these dating into 1996 and 1995. It was clear to this reviewer that the expectations for the content of this notebook had changed with time.

While the notebook contained some 69 items, it was not clear what value these items had to the PBNP staff since it did not appear to be a current or relevant source of information for "open operability determinations. From discussions with several PBNP staff members familiar with Restart Commitment No. 22, this notebook was not a document that would support resolution of this commitment. This conclusion is further supported by the approach taken by the PBNP staff in pursuing closure of Restart Commitment No. 22.

The following items were identified by the independent review effort as having relevant operability concerns (from a listing of all NUTRK open items through February 24, 1997):

- | | |
|-----------|--|
| CR 92-843 | This open Condition Report action challenges the validity of surveillance data collected on RCS Flow. Since appropriate corrective action has not been documented in NUTRK as having been evaluated, the validity of routine Technical Specification surveillance results could be in question. |
| CR 96-385 | This open Condition Report addresses indications from action taken as a result of a 1991 LER, that "...there are cases where the separation criteria are not being met" relative to Main Control Board wiring. While the "supporting determinations" section of this Condition Report does not provide compelling arguments for continued operability, it does conclude that there is "no evidence at this time to support that any components are inoperable". Given that the Condition Report is not resolved, and a confusing determination of operability remains within the Condition |

Report, there appears to be a significant challenge to operability for safety related components with wiring in the Main Control Board.

- CR 96-539 This is a follow-on to CR 96-385, which resulted in an LER 266/96-007-00 that documented operability issues with several safety related components as a result of the cable separation issue. This open Condition Report, and related incomplete activities, are considered to be challenges to the operability of safety related components with wiring in the Main Control Board that do not meet the separation criteria. It is noted that a draft JCO 97-01 and a draft Rev. 2 to the CR 96-385 operability determination exist that potentially justify continued operation with a non-conforming design condition.
- CR 96-530 This open Condition Report questions the validity of the design basis heat load for the Service Water System. The point of issue is the heat load assumed in the unit without the design basis accident. CR 93-083, referenced in CR 96-530, evaluated the same issue based on licensing basis conditions (that is, the non-accident unit remains operating or at hot shutdown). The issue raised in CR 96-530 is an attempt to recognize the real system constraints if the non-accident unit were in a condition requiring RHR System operation. The information in NUTRK, documented in response to CR 96-530, does not satisfy the action item and therefore the CR 96-530 remains open. While this does not represent an operability issue in licensing space, it does challenge the adequacy of operating procedures to deal with likely operating conditions and the need for engineering responsiveness to adverse conditions.
- CR 97-0017 This open Condition Report challenges the design assumption of breaker coordination for the Emergency Diesel Generators (GO1 & GO2) output breakers. The challenge results from the inability to locate the calculation or analysis that demonstrates this coordination among loads and output breakers exists. While the "supporting determination" section of the CR indicates that this is not considered a reportable condition or an operability issue, there is no compelling argument provided that convinces one that if this design assumption is not available, that the design basis accident analysis is not adversely affected. That is, if the coordination of breakers is not capable of being demonstrated by analysis, then this would be considered a non-conforming condition for which the single failure does not apply. That is to say, the single failure in the accident analysis can't be the lack of coordination of breakers. Therefore, if coordination of breakers cannot be assumed, then it would appear that neither safety train can survive the licensing basis safety analysis assumed accident conditions.

- CR 97-0343 This open Condition Report challenges the "Uncertainty and Setpoint Calculation" for two Reactor Protection System Setpoints. While this reviewer does not think the issue resolution will change the RPS setpoints, the sensitivity to clearly document a resolution to an issue that is directly responsible to protect the Reactor Core Safety Limits must be considered in the schedule for resolution. Until a compelling argument can be documented to close this CR, it should be viewed as an operability issue needing resolution prior to restart.
- CR 96-1772 This open Condition Report is labeled as a restart issue. It identifies a weld repair required on 2CC-768 (Excess Letdown Heat Exchanger Relief Valve) with WO 9613897. The work associated with this work order number is not yet complete. It is noted that the "System Open Item Tacking Book" does not contain this item as a restart item in the CCW section. It is also noted that the CCW "System Recovery Book" does contain WO 6613897 in the listing of open work on the system, but there is no indication in this book that the work is a Restart Issue. Also of interest is that LER 301/96-002-00, Action Item 2 (this is the LER that initiated the CR) contains a commitment to observe 2CC-768 for flow induce vibration once flow is initiated through this section of piping. Since this is not identified in CR-96-1776 and there is no tracking activity number reference in the LER, it is not clear to this reviewer how this commitment is being tracked to completion.
- LER 266/96-002-00 Action Item No. 3 contains apparent open actions with respect to the AFW System. Several of these actions relate to understanding the Design Basis and NRC Commitments for the AFW System as well as an actions related related to Restart Commitment No.78. Given the magnitude of the issues causing this LER and the remaining issues with the reliability of the AFW System, it would be this reviewer's assessment that this item is a Restart Item to be completed prior to heat up of either Unit at PBNP.
- CR 96-401 Open Action No.2 discusses SW cooling problems to the AFW Turbine and Pump Bearing. This issue affecting the reliability of AFW should be resolve prior to restart.
- CR 96-264 This open Condition Report contains 9 action items relating to the AFW System. Only item 8 appears closed despite the status being tracked in NUTRK. For example, action 2 is tracked as closed and references a wrong SER to justify the AFW Pump issues when powered from the D/G. Action 4 is closed to an open NUTRK item DBDOI-16-001. These two actions along with the remaining 6 which are tracked as open are considered by this reviewer as restart issues.

- CR 96-715 This open Condition Report is another AFW reliability issue related to the pump discharge pressure controller operation. This is considered a restart issue by this reviewer.
- EWB 97-016 This open engineering work request relates to testing the turbine driven AFW pump (2P29) on steam supplied from Unit 2 RCS Pump Heat. This test is labeled as required to be performed prior to returning 2P29 to service. Resolution of this EWR is therefore a restart issue.
- CR 95-205 This re-opened Condition Report reflects the operability concerns with AFW Flow control. The particular concern in this CR is when AFW flow controllers are in manual with flow adjusted below accident required flow when the hypothetical accident occurs. The concern being that operator action would then be required to achieve accident required flow. Resolution of this CR is considered to be a restart issue.
- CR 97-0109 This open Condition Report reflects a concern for AFW flow capabilities to 1HX-1B (Unit 1- B S/G) due to 1AF4000 being stroke limited. Resolution of this CR is considered a restart issue.
- EWB 97-008 Action No. 1 on this engineering work request is to evaluate the elimination of the 3-minute time delay for the AFW pumps' recirculation valves. Resolution of this request is considered a restart issue. It is noted that the resolution of this concern should not be performed in isolation from the other open AFW reliability concerns.
- CR 96-1537 This open Condition Report reflects a speed control issue with the steam drive AFW pump due to condensate in the steam supply lines. The Condition Report indicates this to be a normal occurrence and that it is a long term issue needing investigation. It appears to this reviewer that the Condition Report underestimates the adverse conditions created by condensate admission to the turbine. The US nuclear industry has documented overspeed trips on AFW pumps due to this condition. As a result, the existence of condensate in the steam lines, sufficient to cause a speed control problems, has been considered a direct and immediate challenge to the operability for the turbine. This industry concern is believed to be described in an SOER issued by INPO in the late 1980's. SOER 86-01 discusses AFW reliability in other specific areas which may also be a helpful source of information regarding these restart concerns. It is believed that another SOER discusses the condensate issues with the turbine driven AFW pumps. The specific reference, however could not be located at this time. Disposition of this CR needs to be completed prior to plant heatup.

- CR 95-155 This open Condition Report describes a potential single failure resulting in disabling the auto start of the steam driven AFW pump on undervoltage. This open CR needs to be dispositioned prior to plant heatup.
- TWR 96-08 This open training request has 3 actions to provide training to the technical, management, and operations areas for TSCR 170. This TSCR affects the CRD Power Distribution Limits and the Operational Safety Limits sections of the Technical Specifications. Proper resolution of this request is considered a restart issue.
- SOER 96-02 The action to address this SOER appears to be undefined at this point. Since the SOER reports on a compilation of events that involved problems with the implementation of new reactor core designs, there are potential restart concerns for Unit 2.
- CR 96-1486 Open action no. 2 for this Condition Report addresses a concern for the start times for the containment fan cooler and containment spray pumps used in the FSAR Safety Analysis. This action is identified as a restart issue in the NUTRAK documentation.
- CR 97-0169 This open Condition Report address a concern for "Safety Analysis Uncertainty Due to Water Being Held in the Lower Refueling Cavity". This is identified as a restart issue for both Unit 1 and Unit 2 in the NUTRAK documentation.
- CR 97-0179 Action 2 for this Condition Report remains open and involves a containment integrity issue with the use of diaphragm valves. This issue should be resolved prior to setting containment integrity.
- CR 97-0117 Action 1 for this Condition Report remains open and involves a concern that there is "potential to be Outside the Reload Safety Analysis in EOP 1.3". This issues should be resolved prior to restart.
- CR 96-1796 This open Condition Report has concerns for the cooling capacity and ethylene glycol mixture in the Control Room HVAC system. Since this could be a potential control room habitability issue, it should be resolved prior to restart.
- CR 96-1746 This Condition Report describes an event where the RHR Pump was operated without a flow path. 7 of 8 actions defined by the review of this event remain open. In light of the human performance focus on this event and other recent events at PBNP, these actions should be resolved prior to restart.

- IR 96-012 This NRC inspection report has several open and closed actions documented in the NUTRK system. Of particular interest to this reviewer is the action 4 which was closed by a confidential memo PBM 97-0178, dated 2/24/97. This memo was the report from PPI on the root cause evaluation of human performance errors that have occurred at PBNP during 1995 and 1996. It is inconceivable that this report does not contain restart issues. In addition of this closed item, several open items exist that would seem to be restart issues to this reviewer.
- CR 97-0297 This open Condition Report documents an event that damaged the Unit 2 Fuel Transfer Cart in January 1997. There are open action that address a root cause evaluation and the repair of the system. These would appear to need resolution prior to fuel load.
- CR 97-0479 This open Condition Report documents loose body to bonnet bolts on 2MS-244. This condition was repaired by WO 9701772 and is awaiting PMT. This Condition Report should be closed prior to restart of Unit 2.
- CR 97-0392 This open Condition Report documents deficiencies with the 10CFR50.59 Safety Evaluations During OSRC Subcommittee Review. The documentation in NUTRK indicates that this is a restart issue.
- LER 266/97-001-00 This report contains 3 open actions related to Safety Injection Delay Times Exceeding Design Basis Values. While the analysis appears to have been completed, these actions should be closed out prior to restart.
- CR 97-0425 This open Condition Report identifies a concern for U2R22 scheduling seemingly lacking a concern for nuclear safety. Discussions with the originator identified that this CR is narrow in scope to the period of time when the Rx Head is being install and re-tensioned. The originator's concern is that this activity requires a mid-loop (reduced inventory) RCS level, and therefore the work completion should proceed on a schedule which would minimize the time in the reduced inventory condition. This concern is consistent with those reflected in GL 88-17. In any event, this CR should be resolved by documentation of management expectations before the time Rx Head installation takes place.
- CR 97-0576 This Condition Report describes the potential operability issue with CC-722A and CC-722B, the Unit 1 and 2 Component Cooling Water Cross Connects. Subsequent to this report, an LER was reported to the NRC when the discharge cross connect (CC-722B) was unable to be opened by the procedural guidance provided to test open this valve. It is noted that CR 95-128 documents a plant condition that took credit for this cross connect feature while the plants were operating. The issue of operability and reportability need to be resolved prior to restart.

- CR 97-0547 This open Condition Report describes an issue of high vibration and unexpected type bearing found in P-32A motor. This condition is also described in CR 97-0513. This issue needs to be resolved in both CR's prior to restart of either unit.
- LER 266/97-003-00 This LER has open actions in the NUTRK system describing needed LLRT work on two spare containment penetrations. These are restart issues for both Units.
- CR 96-1743 This open Condition Report describes a concern over the acceptability of cross connecting the SI Accumulators and reference IN 96-031 (also an open NUTRK item). Since OI 100, "Adjusting SI Accumulator Level and Pressure", Rev.6, dated 12/27/96, was confirm to prohibit the cross connect line up (Precaution 2.6), it would appear that this CR could be closed. If this action was not sufficient to close these two open NUTRK items, then action should be taken to complete these prior to restart.
- CR 97-0517 This open Condition Report describes a potential unanalyzed scenario associated with filling the SI Accumulators. Two open actions pertaining to this CR appear to be closed when reviewing OI 100. This Condition Report should be resolved and closed prior to restart.
- PPE-1996 This item in NUTRK identifies 58 work activities within Plant Performance Engineering. While 20 are documented "done", 38 remain incomplete and many of these relate to IST, ECT or ILRT issues. This condition may border on being an engineering work management issue for restart and should be reviewed by the PBNP staff prior to restart.
- CR 97-0373 This open Condition Report describes the Safety Injection High Head Pump (2P-15A) Trip During the early February ORT-3 Testing and the actions taken to resolve the causes for the problem. CR 97-0374, CR 97-0385 and SER 97-016 are all directly related to this issue and all need to be resolved together. The situation with 2P-15A, as this reviewer understands, is that it runs with an intermittent overload alarm when powered from the emergency diesel generators (G01 or G02). This is caused by the overfrequency condition (engine speed issue) of the emergency power diesel generator. At the time of the ORT-3 testing, this alarm set point was set at 90 amps. This overload alarm is a permissive contact for the "Low Instantaneous Overcurrent" trip(150 amps) logic scheme. The specific condition that automatically tripped 2P-15A was that the overload contact was still closed at the time the operator started 2P-15A and the trip logic was completed. To avoid a trip of this nature in the future, SER 97-016 was approved to raise the overcurrent alarm setpoint to 105 amps. This SER does not address the root cause of the

problem being the over frequency condition of the emergency power supply. Additionally, raising the overload alarm setpoint permits the motor to be run in a condition that is above the normal service factor of 1.15 without warning to the operators. While the documentation in CR 97-0373 indicates that "NEMA standards allow operation of 1.15 Service Factor Motors up to 1.25 times rated load", this type of allowance (and any expected qualifying conditions) could not be found in NEMA Standard MG-1, "Motors and Generators" Revision No. 2, April, 1995. What is found in MG-1, paragraph 20.14.3, "Application of Motors with a Service Factor of 1.15" is that "When the voltage and frequency are maintained at the value on the nameplate, the motor may be overloaded up to the horsepower obtained by multiplying the rated horsepower by the service factor shown on the nameplate".

Nameplate conditions for this motor are as follows:

HP 700
60 Hz
4000 volts
85 amps
3575 rpm
1.15 Service Factor

It is noted that actual operating conditions today are within the MG-1 guidance above for operating within a 1.15 Service Factor while being powered by the diesels. Moving the overload alarm setpoint to 105 amps does not provide assurance, however, that the motor won't operate above the 1.15 Service Factor. It is credible that with this higher overload alarm setpoint, the motor could be operated in a higher Service Factors than that accepted by the NEMA Standard MG-1 (1.15), and even higher than what is believed to be acceptable in CR 97-0373 (1.25).

Additionally, Section III of MG-1-1993, Revision 2, Part 20 page 5, paragraph 20.45 describes "Variations From Rated Voltage and Rated Frequency". While it is clear to this reviewer that the individual variances for voltage (10%) or frequency (5%) are met for this motor, it is not clear that the combined variance for voltage and frequency (10% of absolute values) is met.

Based on the above information, SER 97-016 should be revised to address the diesel overspeed condition and its influence on the tripping of this motor. Raising the setpoint of the overload alarm is considered by this reviewer to be an activity that will increase the probability of occurrence of a malfunction of equipment important to safety previously evaluated in the PBNP FSAR. Based on this conclusion, this change in setpoint can be

considered an unreviewed safety question, requiring NRC review and acceptance prior to making the change.

It is noted that the overspeed issue with G01 and G02 has been a documented concern in the Independent Review of Restart Commitment No. 23 and 78. The final resolutions of these issues should be considered a Restart Issue.

- CR 96-1488 This open Condition Report describes the Service Water piping downstream of SW-64 being 90% blocked with silt/sediment. This line is described as the alternative service water line to the EDG's and Air Compressors. Resolution of this issue should be completed prior to restart.
- CR 97-0218 This open Condition Report describes a potential diesel generator overload condition. Resolution of this issue should be completed prior to restart.
- CR 95-493 This open Condition Report describes a G02 failure to start during an attempt to run in exercise. The description goes on to indicate that this is a recurring problem and a root cause analysis needs to be performed. This issue should be resolved prior to restart.
- CR 94-328 This open Condition Report describes a question concerning the ability to start and load Emergency Diesel Generators per AOP-10A. While three of the four actions appear to be closed, the issue remains open and not completely resolved. Since this is an Appendix R conformance issue, it should be resolved prior to restart.
- EWR 96-138 This open engineering work request deals with the need to filter the G03/G04 Speed Switch power since the speed switch operated while the engine was shutdown (as reported in CR 94-618). The 1994 CR was closed based on the new tracking item EWR 96-138. The age of this issue and its relationship to the reliability of G03 and G04 should point to resolution prior to restart.
- CR 96-122 This open Condition Report describes the need to evaluate the replacement of the G01/G02 Start Circuit with a single Start Circuit. The description goes on to say that the existing scheme appears to expose G01/G02 to more failures. This issue is one of many that by itself may not be a restart issue. However, with the number of D/G issues that are not yet resolved, it would be prudent to disposition this CR prior to restart.

- CR 96-1422 This open Condition Report discusses the potential for G01/G02 Air Relay Valve Failures due to rust or scale in the air start receiver. There are two open actions being carried with this CR that need to be resolved prior to restart.
- CR 96-1443 This open Condition Report describes the failure of the EDG air start motor to disengage, and the need to establish a preventive maintenance task that would prevent the likelihood of this happening in the future. This is another issue that by itself would not be a restart issue, but because of the number of D/G issues that challenge their reliability, this CR should be dispositioned prior to restart.
- CR 96-1386 This Condition Report describes a situation where the G01 Woodward Governor was inoperable due to a jammed spring clip in the gears. The CR requests a root cause evaluation and includes a recommendation to change procedures to check the governor when the engine is shutdown. The disposition of this CR is considered a restart issue.
- CR 96-026 This open Condition Report describes the Containment Fan Cooler potential water hammer issue. This is a JCO issue described in the Independent Review of Restart Commitment No. 18. The resolution of the JCO Administration, by itself, may not be a restart issue. However, the processing of degraded or non-conforming conditions that challenge an operability determination must be clearly understood, practiced and documented by the PBNP staff so that the licensee, including the licensed operators, know of or where to find these evaluations.
- CR 95-593 This open Condition Report describes errors in the Emergency Operating Procedures Setpoint Document. Seven actions were generated by this CR, and it appears four are closed with action not taken except to transfer the responsibility to another responsible party. This EOP setpoints and the setpoint document needs to be correct prior to restart.
- CR 94-147 This open Condition Report describes the need to establish normal and adverse EOP setpoints for reactor level with two RCP Pumps running at a 25% void fraction. This issue should be resolved prior to restart.
- WEST TB 94-02 This open NUTRK item is tracking a Westinghouse Technical Bulletin that discusses damaged fuel assemblies during refueling. The applicability to PBNP has not yet been completely established. This issue needs to be completely resolved prior to fuel reload. The NUTRK documentation reports that this has not yet been done due to lack of resources.

- CR 97-0497 This open Condition Report discusses issues with Temporary Modifications that do not satisfy the procedural controls for this type of activity. While this appears to be only an administration issue rather than an operability issue, the lack of admin control of TM's could be easily become a larger configuration control issue preventing restart.
- CR 97-0556 This open Condition Report discusses concerns for the adequacy of a Technical Specification Surveillance procedure. Since the issue relates to the accuracy of the Nuclear Instrumentation that is feeding the Reactor Protection System, it would seem appropriate to resolve this CR prior to restart of the unit.
- CR 96-321 This open Condition Report discusses a failure of a containment cooling fan backdraft damper and raises the issue of aluminum inside containment. The issues described in this open CR needs to be resolved prior to restart.
- CR 97-0129 This open Condition Report describes an issue with the aluminum inventories in containment. This CR needs to be resolved prior to restart.
- CR 96-1599 This open Condition Report describes a potential internal flooding issue due to the Unit 2 Tendon Access Gallery Sump Pump being unable to function. This CR needs to be resolved prior to restart.
- CR 96-309 This open Condition Report describes the potential degradation of SI -850 A&B. Action 2 & 4 discuss the physical location of the actuators for these valves. This CR references EWR 96-104 which evaluates relocating the actuators up 18 inches to avoid submergence. EWR 96-104 was initiated by CR 96-195. These open and interrelated CR's represent a potential degraded condition needing to be resolved prior to restart.
- CR 96-157 This open Condition Report describes an erratic closing action on 2WG-1787. Since this appears to be a containment isolation valve, this CR should be dispositioned prior to setting containment integrity.
- SOER 96-01 This Significant Operating Experience Report from INPO has not yet been documented as being reviewed in accordance with the NP 5.3.2. The documentation that exists in NUTRK for this item explains delays in the evaluation due to higher priority issues. Since the content of this experience report is perceived to be very much pertinent to the PPI report (PBM 97-0178, dated 2/24/97), the disposition of this SOER should be considered a restart issue.

- CR 96-891 This open Condition Report describes a potential conflict between Technical Specification 15.3.12.2.b and the NUREG-0737 guidance for Control Room Charnal Efficiency. This has the potential of challenging Control Room Habitability and therefore should be resolved prior to restart.
- CAL RIII-96-012 This NUTRK item is actions required in response to the Confirmatory Action Letter identified in this item. There are 8 actions listed with only one completely closed. The remaining items need to be dispositioned prior to restart.
- TWR 96-059 This open training request relates to the need to provide initial and continuing training on the material contained in TSCR 188, and 189. This action is closely related to Restart Commitment No. 80 which relates to obtaining these amendments. Resolution of this item is considered a restart issue.
- CR 96-780 This open Condition Report discusses a potential Technical Specification violation with the Duty Technical Advisor's shift coverage expectations. This issues may have been resolved already. In any event, this open CR needs to be dispositioned prior to restart.
- CR 96-800 This open Condition Report describes a situation where the RPS setpoint changes resulting from the replacement of the S/G's were not reviewed for impact on Reactor Engineering Procedures. This is another item that maybe resolved already. In any event, this CR needs to be dispositioned prior to restart.
- CR 96-440 This open Condition Report describe an unusual noise heard during RHR pump coastdown. Since the RHR pumps have been successfully run since this condition was reported, it is assumed that the issue is resolved. In any event, this open CR needs to be resolved prior to core re-load.
- CR 96-252 This open Condition Report describes the failure of Safeguards Logic Test Switches. From the documentation in NUTRK, much activity has and continues to be recorded. This open CR needs final resolution prior to restart.

The 66 open items identified above are believed (by the Independent Reviewer) to be issues requiring closure prior to restart of PBNP. In a few cases, closure should be achieved prior to fuel movement in Unit 2.

Status:

This review is in progress.

All open Condition Reports through December 31, 1996 (1065 records) have been reviewed by a multidisciplinary team (an NSSS Mechanical Engineering Supervisor, a senior Electrical/ I&C Engineer, and a DSS) to identify open operability determinations. Emergent condition reports since then are being reviewed to identify additional startup issues.

For those condition reports determined to constitute startup issues, the issues will either be completely resolved, a 50.59 evaluation will be completed documenting acceptability of the situations prior to the associated mode changes, or it will be addressed as a USQ.

System Engineers are reviewing all open Condition Reports associated with their systems to identify degraded equipment, operability issues, and restart issues.

As this is a continuous process, the scheduled completion date for this commitment will coincide with the approach to criticality.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 23

Commitment Description: Review 20% of the Condition Reports closed since January 1, 1995 which are associated with PSA safety significant systems for degraded equipment operability issues to ensure that we have adequately identified and dispositioned operability issues. This commitment applies to all Condition Reports, not simply those applicable to Unit 1.

The scope of this review will be examining the identified documents for accuracy and compliance with requirements, per the criteria in the above paragraph. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

The Restart Issues Coordinator will work with the Responsible Person to ensure the sampling methodology creates a 20% population which is both random and representative of the entire population.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 23):
 - When the review occurred.
 - The total number of Condition Reports closed since January 1, 1995 which are associated with PSA safety significant systems.
 - Which specific Condition Reports were reviewed (i.e., the 20%). The Condition Report number for each of these must be included in this summary.
 - Documents initiated or changed as a result of this review. The identification number for each of these must be included in this summary, and a copy of those

documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.

- Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.

3. The Restart Issues Coordinator has verified that the:

- Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
- Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

CR 95-155

For the recommendation to verify other Chapter 14 analyses do not have a similar concern, there was a hand-written note in the file that it does not appear to affect any other analysis. The verification that other Chapter 14 analyses are not affected should be verified as a part of the formal CR closeout.

Action #2 was added to address this issue and is in the closure process. Other than closure of Action #2, no further action is required.

CR 96-850

This CR did not have a clear resolution path. SER 96-028 deleted the requirement for the dedicated operator for AF-4012 during ORT-3A, then this was evaluated with Operability Determination 96-264. SER also referenced 4 other SERs (96-022, 96-023, 96-025, and 96-027).

- SER 96-023 invoked the requirement for the dedicated operator for PBTP-043, but this requirement was not added to PBTP-043.
- Three documents prepared in the same timeframe (SER 96-023, 96-028, and PBTP-043) had different requirements, with the Operability Determination in the CR closure providing the final determination.
- With these multiple documents, they should be consolidated to ensure conflicting requirements do not result. This is especially true for the 50.59s. SER 96-022 should have been updated rather than generating SER 96-028.

- The recommendation in CR 96-850 states that "an operability evaluation is only acceptable for an interim period, and if the deficiency cannot be corrected in a timely manner, a 50.59 must be performed to determine if a USQ exists". The basis for this administrative difference between the need for an operability determination and/or a 50.59 is not clear. These two evaluations complement each other and don't appear to be exclusive of the other based on a sense of how long the condition will persist.

The conclusions of SER 96-023 to assign a dedicated operator to ensure P-38A could be controlled or restored quickly following a diesel loading at high frequency is appropriate as an interim measure to compensate for the Emergency Diesel Generator (EDG) speed control problem for the AFW pump. However, the SER does not address other safety related pumps/motors that could be overloaded as a result of high frequency.

The conclusions of SER 96-028 to remove the dedicated operator based on the assurance that the same timing and response will be provided by the control operator as a result of training and EOP changes does not seem appropriate. Even though the needed controls are in the control room, the responsibilities of the control operator during a transient requiring the EDG to power P-38A should not be compounded. Credit for operator actions from the control room in less than 10 minutes due to known equipment problems seems inappropriate without a dedicated operator.

FSAR Section 12.4.1 "Written Practices" is referenced in SER 96-028 in the statement: "Operator actions provided in the emergency operating procedure set are required to mitigate the consequences of an accident as stated in FSAR 12.4.1". This interpretation of FSAR 12.4.1 does not seem consistent with the FSAR wording. These procedures are required and they will mitigate the consequences of an accident. However, in the concept of defense in depth, they should not replace or negate the need to have the required protective equipment operable at the time of the transient. If P-38A is known to trip, restating the pump with a dedicated operator seems reasonable and adds little risk in the short term. To rely on operator action in the near term, without a dedicated operator, does not appear to be supported by this FSAR section.

Operability Determination 96-624, attached to the condition report, concludes that the probability of an occurrence of an accident is not affected by the release of the dedicated operator and that P-38A is considered operable. This may not be the case since the P-38A pump may be in a degraded condition from the original design assumptions. NUREG 737, Item II.E.1.1 required evaluation of AFW reliability among other AFW issues. It has been previous regulatory practice to accept some form of dedicated operators to compensate for degraded conditions of AFW reliability.

Recommendations:

1. Review PBNP response to NUREG 737, Item II.E.1.1, "Auxiliary Feedwater Evaluation". Ensure the current assessment of the degraded reliability of P-38A is consistent with the licensing commitments made for the PBNP AFW system.
2. Restore the dedicated operator for P-38A in the short term.
3. Resolve the root cause of the P-38A tripping in the near term.
4. Evaluate the reliability of the other safety related motors which would experience the high frequency condition when initially powered from G-01 and G-02.

Action:

Condition Report 97-0415 was initiated to address these issues from the CR 96-0850 review. CR 97-0415 was later closed to OSRC Meeting #56, Action Item #1. In the interim, the dedicated operator has been reinstated. The other items noted above also need to be addressed.

CR 95-079

The short-term corrective actions were adequate. Long-term action plan is appropriate, but the status of the work cannot be determined from the CR, which was closed 2/13/96. In discussions with the Responsible Engineer, these modifications have been completed for G-04, but not for G-03. The CR implies that these modifications were to be completed in 1996. Since the majority of the cold weather for this winter is over, the short-term corrective actions appear to have been adequate; therefore, equipment operability is felt to be acceptable. However, this example illustrates the problem of closing a CR based on a long-term plan which provides no means to track completion of corrective actions.

CR 96-974

STP 14.6 needs to be updated for the new ranges.

The following items were noted which could affect equipment operability.

- CR 95-083 Not clear closed. Only addresses course of action, not completion. WO Tag that was used to close CR (78063) was not found in CHAMPS.
- CR 95-496 Not clear that repair was made or problem resolved.
- CR 96-1410 Not clear closed. Operability status should be in the CR closeout.

- CR 95-440 Closure discusses informing Westinghouse, but no follow-up from Westinghouse on any other long-term action required. Also reviewed CR 95-421.
- CR 96-1230 Relief valves not installed properly. The referenced Work Orders have not been issued yet. Operability needs to be addressed with this relief valve configuration in the interim until they are installed properly.
- CR 95-321 Cannot find referenced Work Order to determine if work has been completed.
- CR 96-033 Cannot determine if heat exchanger is repaired.
- CR 96-119 CR closed to Work Order, but Work Order not issued yet.
- CR 96-432 CR closed to Work Order, but Work Order not issued yet.
- CR 96-725 The impact of delaying replacement of the pressure switch is not addressed.
- CR 95-333 Closed CR to Work Order 11/95. Work Order has not been issued.
- CR 96-727 Not clear if work has been completed. By only reviewing the CR, it is not possible to assess the severity of this problem. It should have been addressed in the CR about the degree of severity of the peeling paint on the filters and the operability impact.
- CR 96-282 The deficiency in the procedures (IT-290B and IT-295B) was properly updated. Basis for 50.59 screening is weak.
- CR 96-131 Screening adequate. However, the CHAMPS update is not addressed. Also, reviewed SER 95-010. CHAMPS should be updated as recommended in CR.
- CR 96-134 It is noted that a team has been formed to review closed systems. However, it is not clear if there has been any action in this task.
- CR 95-357 While not considered an operability issue, the CR does not adequately show closure, only that drawing updates will be done and a Work Order has been written to remove the sump pump from the Ready to Start circuitry.
- General: Many CRs are closed to Work Order or other document. While closing to another CR to prevent redundancy is appropriate, closing to a Work Order,

which is not tracked for closure is not felt to be appropriate. This will be addressed in more detail in Restart Commitment #32.

The Independent Review effort recommended that the following Condition Reports (18) be re-opened:

CR 96-850	CR 96-974	CR 95-079	CR 95-496
CR 95-083	CR 95-440	CR 96-1410	CR 95-321
CR 96-1230	CR 96-119	CR 96-033	CR 96-725
CR 96-432	CR 96-727	CR 95-333	CR 95-155
CR 96-567	CR 96-322		

Status:

This is in the closeout verification process.

The review has been completed. The following closed Condition Reports were identified by the Point Beach review as needing re-opening:

From the 20% Review (14)

95-098
96-131
96-231
96-740
95-155
96-1327
96-1435
96-1839
95-452
96-642
95-493
95-597
96-285
95-331

From the Expanded (100%) Review (29)

96-023	96-829	96-134*
96-076	96-964	
96-1772	95-408	
96-1322	95-409	
96-265	95-444	
95-205	95-489	* redundant
96-080	95-526	to others, so
96-099	96-1689	not to be re-
95-149	96-182	opened.
95-636	96-207	
96-1301	95-158	
96-809	96-070	
96-827	97-0060	
96-054*	96-1312*	

This review was expanded to a 100% review of the PSA safety significant systems, due to operability issues identified in the 20% review.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 24

Commitment Description: Complete an additional Outage Safety Review for the startup phase of the outage. This will evaluate the remainder of the outage schedule from a nuclear safety perspective, not a scheduling perspective.

Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 24):
 - When the review occurred.
 - A description of what was reviewed.
 - Documents initiated or changed as a result of this review. The identification number for each of these must be included in this summary, and a copy of those documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

One review was conducted on February 5, 1997. Another will be conducted approximately 7-10 days prior to core load (needed to do another due to the delay in the outage schedule).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 25

Commitment Description: Conduct an integrated review of all outage licensing commitments (50.59's, enforcement conference items, Technical Specification Change Requests, and the Reload Safety Analysis). Ensure all requirements are met.

The scope of this review will be to identify outstanding licensing commitment issues which need to be resolved prior to mode changes. Those issues will then be appropriately resolved. Should this review identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the review will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 25):
 - When the review occurred.
 - A description of what was reviewed.
 - A list of the outstanding licensing commitment issues that need to be resolved prior to mode changes.
 - Significant items/issues identified during conduct of the review and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

In progress. Licensing documentation is still being reviewed to satisfy this commitment.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 26

Commitment Description: Revise ORT-3 and DCS 3.1.11 to ensure Technical Specification 15.4.6.A.2 testing includes dynamic loading of the EDG with sequenced loads.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Independent Review Results:

No discrepancies noted. The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 27

Commitment Description: Test all EDGs in accordance with revised ORT-3 and DCS-3.1.11. Return the electrical systems to normal alignment prior to leaving cold shutdown.

Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Criteria to Closeout This Item:

1. Completion of the actions defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 27):
 - When the actions defined in the "Commitments Description" section were completed.
 - Significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

During the performance of ORT-3, speed control (frequency) and diesel loading were documented for all four diesels as follows: G-01 at 1180 Kwe at 61.46 Hz; G-02 at 1250 Kwe at 61.3 Hz; G-03 at 1650 Kwe at 60 Hz, and G-04 at 1620 Kwe at 60.05 Hz. ORT-3 did not require this data collection and therefore did not have any acceptance criteria. The frequency on G-01 and G-02 is well outside that which is identified in the FSAR

Chapter 8 and has been earlier identified as having an adverse affect on the reliability of the Auxiliary Feedwater Pumps (Restart Commitment # 23 Independent Review Report). This issue needs to be addressed by WEPCO and determined to be an acceptable condition for G-01 and G-02.

Because of the equipment problems experienced during the performance of the 'A' Train and because of the revised integration of the testing approach, many temporary changes needed to be made to ORT-3 to successfully perform the test. As a result of the scrutiny this documentation will receive once released to file by Operations, a QC verification of the temporary changes and their implementation should be performed to verify compliance to the Point Beach Administrative requirements for these type of procedure revisions. Specifically, QC should be requested to verify that each temporary change actually made to the procedures (there are two ORT-3 procedures signed off for this testing) was properly addressed by the temporary change documentation.

Status:

Operations has completed their review of the ORT-3 documentation. A further review is being pursued.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 28

Commitment Description: Resolve the containment penetration commitments, including:

- CP-32c (Containment penetration for auxiliary charging line). A small leak (4 drops per minute at 1900 psig) was found in the 3/4 inch SI test line (CP-32b). This was documented on Condition Report 97-0003.
- Penetration thermal relief issue. This issue concerns the potential for overpressurization of piping passing through containment, the result causing a loss of containment integrity. For this to be a concern, the piping must be water-solid and isolated by two non-relieving containment isolation valves. Condition Report 96-470 was initiated regarding this following an industry operating experience item from Maine Yankee, which was followed-up by IN 96-049 and Generic Letter 96-06. The PBNP initial response to the Generic Letter was sent to the NRC under VPMPD-96-090.

Should generic issues or significant discrepancies be identified during this resolution which could negatively impact reactor safety, the scope of this effort will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Resolution of the containment penetration commitments defined in the "Commitment Description" section.
2. The Responsible Person has forwarded a summary to the Restart Issues Coordinator which addresses (report using the NUTRK system - NUTRK U2R22 RESTART Action # 28):
 - When the actions described in the "Commitments Description" section were completed.
 - What specifically was done to resolve the containment penetration commitments.
 - Documents initiated or changed as a result of this task. The identification number for each of these must be included in this summary, and a copy of those documents sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.

- Significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified.

3. The Restart Issues Coordinator has verified that the:

- Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
- Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

CP-32c (Containment penetration for auxiliary charging line) - this line is protected by air operated CV-1296, so no modification is required. It was tested per ORT-46.

CP-32b (3/4 inch SI test line) - this work is complete. Similar Unit 2 containment penetrations were inspected and found to be intact, so this is not considered a generic problem. A work order has been initiated to perform these same inspections during U1R24

Penetration thermal relief issue - the concern is being evaluated under Condition Report 96-470 (also identified by IN 96-049 and GL 96-033). The following lines were identified as concerns by the evaluation:

- P-11 (RCP seal water return line) - operability for Unit 1 required 2 inches of cal/sil insulation inside containment. Insulation was installed per Work Order 9700318. A four-hour NRC event notification was made concerning this on Unit 1, and an LER is being submitted. P-11 was modified per MR 96-057*B (modification has been installed and is awaiting PMT) to install a check valve around 1CV-313A inside containment to provide an overpressure protection flow path.
- Potential overpressure concerns exist for the pressurizer liquid sample line (P-28b). Penetration P-28b will require pressure relief by MR 96-057*D, for which the final installation details are being determined.
- P-12a (DI water supply line) - The Unit 1 DI water supply line has been drained four times. Three gallons drained out the first time, four ounces were drained one week later, three ounces were drained several weeks later, and 6 ounces were drained 2 months later. This confirms that the line will not become water solid during the

operating cycle due to valve leak-by (3 gallon capacity). For Unit 2, CL-1b has been revised on February 11, 1997, to ensure the DI water supply line does not become water-solid during power operation. This will result in one PAB DI hose station being removed from service. As a long-term solution, modifications will be required to allow isolating P-12a piping without causing a loss of DI water to other components. Until then, periodic draining will occur.

- P-30c (Pressurizer relief tank makeup) - this line is protected by air operated diaphragm valves, so no modification is necessary.
- P-53 (Heating steam condensate return) - this line was verified not water-solid on Unit 1. For Unit 2, this line is being cut and weld-capped per MR 96-068 during U2R22.

These modifications are scheduled to be accepted by May 16, 1997.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 29

Commitment Description: Complete a 50.59 evaluation for the existing CCW supply to the RCP seals as a safety function. In 1992, Point Beach Nuclear Plant committed to making this configuration consistent with the classification of that function as a safety function. This is already classified as safety related from a pressure boundary standpoint, but not for the flow function.

Should this evaluation identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of this effort will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the 50.59 evaluation.
2. The Responsible Person has forwarded to the Restart Issues Coordinator:
 - A copy of the completed 50.59 evaluation.
 - A summary which addresses significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 29).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

This was reported as complete by the Responsible Person. The independent review identified that the reported closure actions did not meet the commitment. The issue has been re-opened.

Status:

This is in progress.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 30

Commitment Description: Update the diesel generator loading calculation N-91-016 to properly reflect the loading of the Containment Fan Coolers (Containment Accident Fans).

Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the diesel generator loading calculation task update defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Restart Issues Coordinator:
 - A copy of the revised coverpage to the diesel generator loading calculation N-91-016 and the page showing the new reference (#61).
 - A summary which addresses significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 30).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

Not yet drafted.

Status:

This is in progress. Testing was performed during the ILRT to measure the electrical consumption of the Containment Fan Coolers. Further actions to resolve this include:

- Calculation 97-0038 will be updated based on that electrical current data.
- The output of that calculation will be used to revise the DAPPER software (the means to run the load flow analysis).
- The DAPPER Program will then be re-run.
- Calculation N-91-016 will be revised at the completion of the DAPPER run.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 31

Commitment Description: Evaluate the adequacy of coordination on the 120 VAC instrument bus system through a 50.59 evaluation or operability determination.

Should this evaluation identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the evaluation will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the evaluation/operability review defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Restart Issues Coordinator:
 - A copy of the 50.59 evaluation or operability determination.
 - A summary which addresses significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 31).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

Not yet drafted.

Status:

This is in the closeout verification process.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 32

Commitment Description: Implement interim improvements for the Condition Reporting process, based on a review of assessments and identified recommendations for improving that process.

Completion Timing: This will be completed prior to the Unit 2 approach to criticality.

Criteria to Closeout This Item:

1. Completion of the implementation of interim improvements for the Condition Reporting process defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Restart Issues Coordinator:
 - A copy of the interim improvements for the Condition Reporting process.
 - A copy of the Corrective Action Process Team report and action plan.
 - A summary which addresses significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 32).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

Several recommendations for improving the process were identified (previously discussed with members of the Corrective Action Process Team).

Status:

This is in the closeout verification process.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 33

Commitment Description: Implement interim improvements for the 50.59 process to require that all screenings be either authored or reviewed by a member of the multi-disciplinary review team.

Completion Timing: This will be completed prior to the Unit 2 approach to criticality.

Independent Review Results:

Monitor procedure NP 10.3.1 feedback /Form PBF-1515 user feedback. Periodic review of 10 CFR 50.59/10 CFR 72.48 screenings should be performed to verify that the changes to NP 10.3.1 and PBF-1515 are establishing programmatic consistency of the screening documents (NUTRK U2R22 RESTART Action # 90).

Status:

Verified closed. The associated documentation was provided to the NRC.

Let's begin...

THESE ARE THE FIRST OF A SERIES OF LECTURES ON THE HISTORY OF

THE UNITED STATES OF AMERICA

THE FIRST LECTURE WILL BE ON THE EARLY HISTORY OF THE COUNTRY

FROM THE FIRST SETTLEMENTS TO THE REVOLUTION

THE SECOND LECTURE WILL BE ON THE REVOLUTION AND THE FOUNDING OF THE NATION

THE THIRD LECTURE WILL BE ON THE EARLY YEARS OF THE NEW NATION

THE FOURTH LECTURE WILL BE ON THE GROWTH OF THE COUNTRY

THE FIFTH LECTURE WILL BE ON THE CIVIL WAR

THE SIXTH LECTURE WILL BE ON THE RECONSTRUCTION PERIOD

THE SEVENTH LECTURE WILL BE ON THE PROGRESS OF THE COUNTRY

THE EIGHTH LECTURE WILL BE ON THE PRESENT DAY

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 34

Commitment Description: Upgrade Unit 2 operations checklists to include requirements for initials, time, and date. During the review, verify that the checklists are technically correct.

Should this upgrade identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the upgrade will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This is also a subset of Enforcement Conference Commitment Item # 18.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown. If some systems/components addressed per this commitment are required to be operable before that mode change per Technical Specifications, the applicable portions of this commitment should be completed earlier.

Criteria to Closeout This Item:

1. Completion of the actions defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Enforcement Conference Commitments Coordinator:
 - A listing of which Unit 2 operations checklists were reviewed, with an indication of which were revised (report using the NUTRK system).
 - A copy of each revised Unit 2 operations checklist.
 - A summary which addresses significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Enforcement Conference Commitments Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

In reviewing the "Action Item Status Report" dated 2/11/97 for this Commitment #34, the population of Checklists reviewed for this commitment was 22 based on a list provided by Operations. This status report identifies an additional 38 checklists that are common to both Units but were deemed not to be part of the commitment. Using the Operations Checklist Index, Rev. 139, dated February 11, 1997 however, there appears to be a discrepancy with the number of checklists that are designated Unit 2. The index identifies at least 26 Checklists that are designated Unit 2.

During the review, a verification that the checklists are technically correct was to be performed. The expectations for what this review really was meant to accomplish varies with those involved with the work. From interviews with the people actually initiating several of the changes, the review was ensuring the new checklist was technically the same as the previous list, except for known new components that were added and the correction of any obvious administrative typing errors. At least on these examples, there was not a walk down of the system to verify the accuracy and correctness of the checklist as was expected by others. The "Technical Review" sign off on the change cover sheet (PBF-0026a) for these examples was not intended to verify the technical correctness of the checklist. From discussions, this signature verified the specific change to the checklist was correct. In these cases, the only changes to the checklist were administrative and therefore technical correctness of the list of components on the checklist was done to the extent described above by the initiator of the changes

Status:

This has been re-opened to address an increased number of checklists and greater consistency in the technical verifications. Field walkdowns to verify the adequacy of the checklists and P&ID's are in progress. The process to be used for this verification is as follows (complete the following tasks for each checklist):

Note: These tasks can be performed in any sequence by different personnel as long as all of the following tasks are performed for each checklist. Task 1 should be performed by an SRO or facility management.

1. Complete an in-plant walk-down the checklist in its entirety (this step can be accomplished through actual performance of the checklist or by visual hand-over-hand walk-down of the checklist).
 - a. Verify that all components encountered in a system under Operations' Department control are identified by the checklist and that all components identified on the checklist exist in the plant.
 - b. Verify all components encountered are properly labeled.

- c. Identify any discrepancies between the "as-built" plant and the checklist and submit corrective actions.
2. Technically validate the checklist to the controlled P&ID's:
 - a. Either walk-down the P&ID in the field, noting any discrepancies between the "as-built" facility and the P&ID, or table-top compare the P&ID with the field-validated checklist.
 - b. Identify any discrepancies between the P&ID and the checklist and submit corrective actions to resolve any incorrect documents.
3. Determine if checklist items require independent verification using the guidelines of INPO Good Practice 87-003 which provides the following Guidelines:
 - a. All valves, breakers, and other components in SAFETY-RELATED systems where an inappropriate positioning could adversely affect system operation or containment integrity; OR,
 - b. All valves, breakers, and other components in FIRE PROTECTION system major flow paths (includes water, halon, CO₂, and fire detection capability) necessary for the system to function and supply extinguishing media to the fire; OR,
 - c. All valves, breakers, and other components in gaseous or liquid radioactive waste-handling and processing systems where if misaligned would result in a radioactive material release to the environment.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 35

Commitment Description: Revise applicable IST program documents to prevent equipment from being returned to service (declared operable) with vibrations in the alert range.

Should this revision effort identify either generic issues or significant discrepancies which could negatively impact reactor safety, the scope of the effort will be expanded. Where discrepancies are identified, appropriate corrective and preventive actions will be taken commensurate with their safety significance.

This commitment is also Enforcement Conference Commitment Item # 41.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Independent Review Results:

No discrepancies noted. The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 36

Commitment Description: Revise NP 8.1.1, Work Order Processing, and NP 8.1.3, Post-Maintenance Testing, to ensure post-maintenance testing, operability testing, and surveillance testing requirements are properly addressed.

This commitment is also Enforcement Conference Commitment Item # 57.

Completion Timing: This should be completed prior to the Unit 2 approach to criticality.

Criteria to Closeout This Item:

1. Completion of the actions defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Enforcement Conference Commitments Coordinator:
 - A copy of the revised documents.
 - A summary which addresses significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Enforcement Conference Commitments Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the task are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

It is noted that NP 8.1.1 step 5.7 addresses identification of PMT's as the responsibility of the Work Group. However, NP 8.1.3 seems to say in step 5.1.1 that this responsibility resides with the Maintenance manager and I&C Manager.

NP 8.1.3, Rev. 1, dated February 24, 1995 was reviewed and a reference to NP 8.1.1 could not be identified. Additionally, this procedure does not appear to address the PMT's now performed and documented in operating procedures (restart commitment # 13). There also appears to be conflicting or at least inconsistent guidance in the PMT requirements in NP 8.1.3 Attachment A, and OM 3.20, "MOV/AOV Operation and Maintenance".

Based on this independent review, it does not appear that NP 8.1.3, Rev.1, dated February 24, 1995 satisfies Restart Commitment # 36. NP 8.1.3, Rev. 1 should be reviewed and revised as necessary to reflect current management expectations for proper Post-Maintenance Testing.

Status:

This has been re-opened. NP 8.1.1 and NP 8.1.3 need to provide consistent management expectations.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 37

Commitment Description: Include return to service testing in the plant schedule, both outage and nonoutage.

This commitment is also Enforcement Conference Commitment Item # 59.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Independent Review Results:

No discrepancies noted. The independent review concluded that there are no items associated with this commitment which would impede Unit 2 startup.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 38

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications:
Modification 96-033 - replace control power transformers on Motor Control Centers 2B32 and 2B42.

These control power transformers were identified as being relatively undersized. This modification will replace the approximately 60 existing Unit 2 control power transformers with larger ones to increase the margin for performing their function.

There are approximately 30 common control power transformers associated with this modification which will be replaced after U2R22, during a system outage or when the equipment is not required.

Completion Timing: The physical work should be completed prior to the Unit 2 core loading. The PMT will be accomplished at various times during and following the outage.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 38).
3. The Restart Issues Coordinator has verified that:
 - The Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).

- The Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
- The significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

The Safety Evaluation screening identified that Work Order 9606757 was written for replacement of breaker B52-327C. WO 9606757 identified that it was written for breaker B52-326M. A Work Order already existed for breaker B52-326M (WO 9606756), therefore, WO 9606757 was signed off noting that it was a duplicate and no work was performed. WO 9612224 was subsequently created to provide direction for replacement of breaker B52-327C. The RE was notified to make the appropriate pen and ink changes to the Safety Evaluation screening document.

Verification of pen and ink changes to the Control Room/WCC drawings was performed. The Document Update Sheet (DUS) identified that pen and ink changes to the Westinghouse Elementaries (499B466 series) are required for acceptance of the modification. The controlled drawings associated with the above Work Orders were verified to be marked-up in the WCC. During this review, it was discovered that breaker B52-429M was not identified as a spare breaker on Westinghouse drawing 499B466 Sh.597B as it is in the design documents and Work Order. The Westinghouse drawings list the breaker as the power supply to the W-12D G02 exhaust fan. Condition Report CR 97-0689 was initiated to track this restart issue. The description of the CR identifies that improper testing was performed on the breaker since testing of the exhaust fan was not conducted. However, based on review of the Master Data Book (3.2.6) and a field walkdown, this breaker is a spare and Westinghouse drawing 499B466 Sh.597B is incorrect. This CR remains valid but should be assigned to the RE of the modification which spared the breaker out. To avoid any confusion, Westinghouse drawing 499B466 Sh. 597B needs to be revised in the WCC/Control Room to accurately depict breaker B52-429M as a spare.

Work Order 9606812 was written for replacement of spare breaker 2B52-427J. The Work Plan for this breaker replacement incorrectly identified the spare breaker number as 2B52-325C. The first 12 steps of this Work Plan were performed and signed off on the 21st and 22nd of November. On November 24, all references to the 2B52-325C breaker number were lined out and changed to 2B52-427J (with the exception of step 5 which was inadvertently missed). This was done in steps which were previously signed off as being completed. Condition Report CR 97-0676 was initiated to identify this issue. A physical walkdown of the MCC's was performed to verify the replacement work. Both of the breakers had the new 150VA transformers installed. Further review of the Work Orders identified that WO 9606749 provided direction for the replacement of 2B52-

325C. In addition, the RE has made a pen and ink change to step 5 of the completed Work Order to reflect the change to 2B52-427J.

The Work Plan for WO 9606812 incorrectly lists the Reference Drawing for breaker 2B52-427J as Bechtel Drawing E-2092 Sh. 8. The actual reference should be Sh. 14. This discrepancy should only require a pen and ink change by the RE.

During PMT of WO 9606803, the functional testing could not be completed because an overload could not be reset. WO 9612665 was initiated to replace the starter with a starter from a spare bucket (2B52-425C). WO 9612665 has been verified as completed and has completed the functional testing of valve 2RH-701. A search of Condition Reports using both of the reference WO's did not find an associated CR. A CR should have been generated to track this problem.

A SQUG walkdown of the MCC needs to be completed to review the transformer replacements prior to Unit 2 restart. This review cannot be completed until all breaker replacements in the MCC are completed.

Status:

The physical work has been completed, and the modification is awaiting PMT.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 39

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 90-048 - replace Boric Acid and Reactor Makeup Water totalizers, replace the CVCS control switch, replace flow indicators, and refurbish flow control rollers.

Due to their unreliability when operating in automatic, these controls have been used in the manual mode. This resolves a workaround issue.

Completion Timing: This should be in a conditionally accepted status prior to the Unit 2 core loading (only awaiting PMT). It should be in an accepted status prior to the Unit 2 approach to criticality.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 39).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

The Document Update Sheet (DUS) identified that changes to the Alarm Response Books (ARB) are required. The DUS identified that these changes would be performed as a closeout item. Per discussion with Operations, it was concluded that the changes to the ARBs should be a modification acceptance item. This issue was discussed with the RE. The RE has submitted (1/11/97) a Temporary Procedure change and a Permanent Procedure change to ARB 2C04 2C 2-4 and 2C04 2C 3-4. The Temporary Procedure changes was submitted to provide immediate change to the ARB. The temporary change indicates that Plant Just-In-Time Training is required for ARB changes.

Verification of pen and ink changes to the Control Room and WCC drawings and MDB was performed. All pen and ink changes have been made to the documents listed as acceptance items on the DUS with the exception of Westinghouse Drawing 499B466 Sh. 62A. This Westinghouse drawing is a new drawing being added by MR 90-048*B. Since the drawing was issued as a working drawing, the RE was not sure if it could be placed in the Control Room/WCC. Per discussion with the RE, a permanent drawing transfer of dwg 499B466 Sh. 62A is being expedited in an attempt to place this drawing in the Control Room/WCC ASAP. Until the permanent drawing is placed in the Control Room/WCC, the working drawing needs to be there. The document control drawing coordinator has issued a controlled copy of Working Drawing 499B466 Sh. 62A to the WCC. I have verified that the working drawing has been incorporated into the WCC controlled binders.

Status:

This modification has been conditionally accepted (based on flow testing to the "B" Holdup Tank). Final acceptance will require in-service testing or additional PMT after the VCT is returned to service.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 40

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 94-097 - remove six RCS loop drain valves.

These valves are radiological hot spots and potential leakage paths. Due to leakage from one of these valves, the unit was forced to shutdown. Maintenance draindowns can be performed from other loop drain valves.

Completion Timing: This will be in an accepted status immediately after the RCS leak check, per Technical Specification 15.4.3.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 40).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification

Independent Review Results:

No discrepancies yet identified.

Status:

The physical work has been completed, and the modification is awaiting PMT (completion of the RCS leak test).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 41

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 92-141 - relocate the RHR flow control valve controllers on 2CO3 for human factoring.

Train "A" and train "B" main control board controls typically have a left to right convention on Unit 1 and a right to left convention on Unit 2. This convention was not followed for the RHR controllers 2HC-624 and 2HC-625, and this modification corrects that. Also, the common flow controller 2HC-626 will be positioned between these two RHR controllers to improve their separation.

Completion Timing: This should be in an accepted status prior to the Unit 2 core loading.

Independent Review Results:

The modification package documents were adequate with the exception of the Documentation Update Sheet and Closeout Checklist. The A.2 checklist item "Plant Status Update/Just-in Time Training" was identified as N/A on the checklist. On the Modification Request Approval Form, the SCE Group Head indicated the need for Plant Status Update Training for the Licensed Operations personnel under "Scope of Training". Also, discussion with Operations training personnel noted that any changes to the main control panels would warrant training prior to returning the system to service.

Follow-up interviews were conducted with the Operations Training department with respect to repositioning of the RHR controllers on the 2CO3 panel. Operations Training had become aware of the proposed changes of the controllers and trained the Operators to this change in Plant Status Update Training (LOR 96-6) under Lesson Plan 2500. Therefore, training was conducted and is complete.

The modification package did not address any SQUG related issues with respect to the 2CO3 panel evaluations. Per discussion with the RE, the SQUG program was not considered for the design of the modification. Subsequent discussion with the SQUG coordinator indicated that any changes to the Main Control Boards should be identified to the SQUG group for assessment. The RE has been made aware of this issue and will obtain a documented review by the SQUG group.

The Return to Service Testing Review sheet for Work Order 9605772 did not have a sign off for Post-RTS approval of the PMT testing. The appropriate I & C individual was notified and indicated that the Work Order review sheet would be reviewed and approved. The I & C approval signature has been verified, and no further action with this issue exists.

Modification 92-140 will perform the same controller repositioning on the 1C03 panel. The RE has been notified of the need for Plant Status Update Training as a documentation acceptance item and has acknowledged that it will be added to the Documentation Update Sheet and Closeout Checklist.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 42

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 96-073 - seismically upgrade CCW, SI, RHR, and RHR/letdown piping supports and remove an AFW snubber.

Completion Timing: This should be in an accepted status prior to the Unit 2 core loading.

Independent Review Results:

The modification package (MR 96-073), 50.59 Safety Evaluation, and Installation Work Plan were reviewed. The safety evaluation matched the modification final design (both in scope and content) with the exception of the description of the number of supports being modified. The final design description identified that 6 supports would be replaced and the safety evaluation identified 5 supports to be replaced. The IWP detailed the replacement of 5 supports which is consistent with the safety evaluation. Therefore, this does not represent a significant issue and the RE was notified to make the necessary pen and ink change to the final design description. The scope of the modification was not changed during installation.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 43

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 94-066*A - install a soft seat in containment isolation valve 2SI-834D, and add a relief valve and pressure regulator in the nitrogen supply line to the SI accumulators.

The soft seat is being installed to improve leakage performance. The relief valve and pressure regulator are being installed to ensure the piping is not overpressurized. This resolves a workaround issue.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Independent Review Results:

Condition Report 96-1248 and QCR 96-085 were generated in performance of MR 94-066*A. These CR's were reviewed, with both addressing the loss of traceability of 1" Schedule 40 and Schedule 160 piping. QCR 96-085 was closed since redundant with CR 96-1248. Original CR 96-1248 response reviewed did not show adequate resolution of non-QA Schedule 160 pipe. On discussing with RE, it was determined that the non-QA pipe was actually replaced with QA pipe with all required certifications. This resolution was incorporated in the revised CR 96-1248 response. CR 96-1248 was appropriately closed, with the correct resolution to Schedule 160 pipe traceability.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 44

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications:
Modification 96-065*B - seismically upgrade the Refueling Water Storage Tank recirculation line.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 44).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

The issue which originally initiated this modification request was a Condition Report which raised questions regarding compliance with the FSAR which requires all seismic class breaks to be made at normally closed valves or valves which can be operated from the Control Room. The current configuration of the RWST recirculation piping has the seismic class break at manual valves which are normally closed, but will remain open for several days or weeks when RWST recirculation is in use. The Final Design discusses this situation and identifies that Operations will closely control the operation of the system by minimizing the duration of time that these valves are open and will assign dedicated Operators to close the valves if required. This Operator action has been identified as an interim condition which will only be required until the second phase of the seismic upgrade is completed.

The 50.59 safety evaluation for this modification, discusses the same scope and interim conditions that were identified in the Final Design. However, the 50.59 notes that the interim condition which involves Operator actions for operating the manual valves will be addressed in a separate safety evaluation. Review of the Document Update Sheet (DUS) and Work Plan indicates that this portion of the modification appears to have been lost from the scope of MR 96-065. The document acceptance items in the DUS and IWP identifies that PC-25 need to be made a "On Demand" procedure and administrative control tags need to be placed on the manual valves. To completely address the scope of MR 96-065, PC-25 needs to be revised to identify the dedicated operator actions w/r/t valves 1SF-820 and 2SF-820B. In addition, a 50.59 Safety Evaluation of the interim operator action needs to be completed as well as training to the PC-25 changes. These actions are significant issues to the Unit 2 restart and need to be completed as acceptance items for the modification.

A procedural revision to PC-25 was not in the administrative system. Operations was made aware of this problem and initiated temporary changes to PC-25 and PC-25A Part 1 for both units. A 50.59 screening was performed and attached to the temporary changes. However, this screening only cover the procedure change and does not detail the acceptability of a dedicated operator as expected and discussed in the final design. The RE needs to review the existing safety evaluation and determine if an additional safety review is required to address the use of a dedicated operator. The RE needs to review the existing safety evaluation for MR 96-065 and the temporary procedure change 50.59 screening to determine if an additional safety review is required to address the use of a dedicated operator.

Status: This is in progress.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 45

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications:
Modification 96-054 - install pressure gauges in the service water return header from the Emergency Diesel Generator GO1 and GO2 glycol coolers, and reset the throttle valves in that line.

GO1 and GO2 throttle valves must be reset to meet the assumptions made in the new service water flow model. Prior to the modification, valves were set using an assumed "worst case" service water return header pressure. The new gauges will allow valves to be set with actual pressure. This will better balance the service water system flows and enhance service water system performance.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 45).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).

- Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
- Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

No independent review has yet been conducted.

Status:

This work is scheduled during the week of May 12, 1997.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 46

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 96-022 - install a new 125 VDC feed (for DC Control Power) to 480V safeguards bus 2B03.

This supports the effort to align DC systems which supply DC control power to the 480 V buses, 4160 V buses, and the normally aligned EDGs.

Completion Timing: This should be in an accepted status prior to the Unit 2 core loading.

Independent Review Results:

The modification package (MR 96-022), 50.59 Safety Evaluations, and IWP 96-022-2 were reviewed. The safety evaluation matched the modification final design (both in scope and content). The scope of the modification was not changed during installation. Although the Documentation Update Sheet (DUS) identified that changes to 499 series elementaries, MDB, etc were required as an acceptance item, no sign off of completion was provided. The RE noted that since the modification package was written for both the Unit 1 and Unit 2 work scopes, this item could not be signed off until the Unit 1 installation was complete. To avoid confusion, it was agreed with the RE that items completed for Unit 2 would be signed off with a note stating that the signature indicates completion of the Unit 2 scope only.

The 50.59 safety evaluation and Document Update Sheet (DUS) identified that changes to the AOPs are required. The DUS however identified that the procedure changes and training to the procedures are a closeout item. The 50.59 identified that a change to the Abnormal Operating Procedure is required to prevent spurious operation of equipment during an Appendix R fire scenario. The change to the AOP would provide direction to de-energize the new DC Control power supplies to the 2B03 bus. This appears to be an acceptance item rather than a closeout item. Discussion with the Operations group identified that the changes to the AOPs and associated training should be classified as an acceptance item for the modification. The DUS identified that AOP-0.0 and AOP-10A are impacted by the modification. Upon review of these procedures, AOP-0.0 was revised 10/18/96 to Rev 9 and incorporates changes associated with MR 96-022. AOP-10A has a Temporary Change against the current revision and includes changes

associated with MR 96-022. Per discussion with Operations Training, training to the AOPs has been conducted in Plant Status Update Training (LOR 96-06) under Lesson Plan 2500. Therefore, changes to the AOP and training are completed.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 47

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 94-055 - add seismic supports to the raceway between risers 56 and 62 on 2C04 (Reactor and Primary Plant Control Board).

The cable tray was sagging due to weakening caused by a sidewall wireway being cut into the cable tray to allow the exit of some wiring. The addition of these supports restores the full integrity of the cable tray.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Independent Review Results:

The modification package (MR 94-055), Safety Evaluation screening, and WO Work Plan were reviewed. The safety evaluation screening matched the modification final design (both in scope and content). However, the installation design per Working Drawing SK-MR-99-055 details the use of 2" X 2" X 1/4" angle to reinforce the ceiling of the 2C04 panel and to distribute the weight of the support to the panel framing. This aspect of the design is not specifically discussed in the final design or Safety Evaluation screening. Since a SQUG walkdown review of the modification is performed, the additional weight of the angle iron and the additional hole drilled for the angle iron connection to the ceiling is considered by the SQUG reviewers.

Although the use of a Safety Evaluation screening is appropriate, the basis for the screening lacked substance regarding the impact of drilling holes in the Main Control Board ceiling and the method of supporting the weight of the wireway (i.e., screening did not address structural capacity, additional weight of support components, or the impact to the control board). In addition, information regarding the SQUG walkdown and the considerations reviewed as part of the walkdown would help support the basis of a screening review.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 48

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 96-068B - eliminate containment heating steam and condensate return containment isolation valves.

These were determined to be unnecessary to support plant operations. Removal eliminates a potential containment leakage path and reduces the need to conduct future Appendix J testing on these.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Independent Review Results:

The Document Update Sheet (DUS) identifies that Plant Status Update Training to MR 96-068*B, procedure changes to ORT's and revision of Checklists are required to be completed as closeout items to the modification. Abandoning the Containment Heating Steam Supply system and changes to Operation procedures should warrant training as an acceptance item. This issue was discussed with Operations Training. Training was aware of the modification changes and had already conducted training to MR 96-068*B in Plant Status Update Training 97-01 under Lesson Plan 2525. It was also identified that training included proposed changes to procedures and checklists affected by the modification.

Status:

In progress.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 49

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance testing and return to service completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications:
Modification 96-053 - replace an elbow in the west service water header.

A temporary, non-code repair was performed in July 1996 on the service water 6 inch elbow per temporary modification TM 96-014. There is an NRC commitment to perform the code repair prior to the exit from the next refueling outage. Further pipe inspections revealed a second elbow with wall thinning (no leak yet). Both elbows are normally unisolable from the west service water header.

Completion Timing: This should be in an accepted status prior to the Unit 2 core loading.

Independent Review Results:

The independent review has not yet been conducted.

Status:

In closeout verification.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 50

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications:
Modification 95-070 - seismically upgrade the containment cooling fans and filters.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 50).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

This is in the closeout verification process.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 51

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 96-026 - install, delete, and modify supports for feedwater, main steam, and SI system piping for the 79-14 project.

The piping and pipe supports for these systems have been evaluated for their ability to withstand design basis loads and stresses. Analysis shows that these piping systems are operable in their present configuration and prior to these modifications. However, various transients have been postulated that could result in stresses above code allowances, and these modifications will reduce these stresses to below code allowable.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Independent Review Results:

The modification package and safety evaluation were adequate. In the Installation Work Plan, Maintenance identified that verification of the spring hanger setting of support EB-1-MS-2H5 could not be performed since the load plate was missing. It was further indicated that the spring was reset by maintenance to the as found setting (prior to the mod). There was no reference to an engineering resolution of this issue in the IWP. Upon further investigation, the RE had requested direction for resolution of this issue with maintenance and the NDE group. The resolution requires that the location of the spring can indicator be physically measured to correlate this to the load setting. A concern exists that there is no guidance given to identify where the measurement needs to be taken from (i.e., to identify where the vendor's 0" setting is). In addition, the EB-1-MS-2H5 spring hanger is identified as a Grinnell, size 17, type D, figure 98 unit. The acceptable load range specified in the IWP (11,163# to 14,100#) exceeds the maximum load specified by the vendor (13,000#) for this particular spring hanger unit. The load range provided in the RE's response allowed the spring hanger to be set from 5 1/4" to 7". The 7" setting is the maximum total travel of the spring hanger. Engineering has been notified of the potential discrepancies associated with support EB-1-MS-2H5. Of particular concern is that the piping/support analysis uses the correct spring hanger data, the hanger is properly set, and seismic displacements are not a concern at the current setting.

The IWP also noted that the supports for valves 2-SI-878A and 2-SI-878C had to be cut and re-welded to facilitate removal. There does not appear to be any engineering acceptance of this change. In addition, the NDE step was not modified to require that the weld at the cut be inspected. Upon review of the NDE examination records (contained in the Work Order Package) for this IWP, the examination does not appear to include a review of the new weld made to the motor bracket support. The RE has been notified of this issue and should obtain engineering concurrence for the method of cutting and re-welding of this support and verify that an NDE visual weld inspection is performed to accept the new weld.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 52

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 96-058 - move Power Plant Computer System alarms to the exterior of C-20 panels. This will enhance the alarm sound levels.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Independent Review Results:

No discrepancies noted.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 53

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 94-095 - replace 8 Main Steam Condenser steam dump valves with improved design.

This will resolve a workaround issue, as the performance of these valves has not been satisfactory.

Completion Timing: The physical should be in an accepted status prior to Unit 2 leaving cold shutdown. The PMT will be completed after on-line.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 53).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in the tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No independent review yet conducted.

Status:

This is awaiting PMT, which involves acceptance testing with steam (need to complete PC-11, Part 3, which references OI-13). The PMT will be completed following reactor startup.

Additionally, the documentation associated with this modification has been lost, so needs to be reconstructed.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 54

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 95-029 - replace SI accumulator level transmitters.

The purpose of this modification is to provide a more accurate and reliable level indication system for the SI accumulators. The current capacitance probe type level indicators are being replaced with Rosemount differential pressure transmitters.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 54).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

Seven ECR's were generated in support of this modification. All ECR's except ECR #97-0001 have been approved. ECR #97-0001 needs to be approved as an acceptance item for modification testing. The ECR's have designated that they are QA scope. Based on NP 7.2.3, ECR's which indicate QA scoping require a technical review to be performed on the proposed change. None of these ECR's had a technical review documented. Per discussion with the RE, the ECR's were scoped QA based on the scoping of the modification. When the ECR's did not impact the QA scope, the RE would indicate this in the resolution section of the ECR. To comply with NP 7.2.3, Technical Reviews should be performed and documented in the Additional Review section of the ECR form for ECR's 96-0012, 96-0114, 96-0115, 96-0127, 97-0001, and 97-0011. As an alternative, the RE may want to re-review the ECR's to appropriately classify the scope as QA or Non-QA. Technical Reviews need to be performed for those ECR's which are classified as QA scope as an acceptance item for modification testing.

The Weld Checklists for Work Order 9606041 had indicated that the welds were outside the Section XI boundary and notification of the ISE Engineer was not required. Based on CR 96-1482, the welds were within Section XI scope and should have required ISE Engineer notification. The weld checklist were prepared prior to the initiation of the CR and it was not immediately clear if the workscope received the appropriate Section XI reviews. An ISE Engineer was interviewed to discuss and review the MR 95-029 work packages. The ISE Engineer verified that the appropriate RRM forms/review sheets were completed to address the ISI requirements and reviews. The ISE Engineer was satisfied that the ISI program was appropriately implemented. No further action is required on this issue for Unit 2 restart.

Status:

This is awaiting completion of PMT. The remaining testing includes a leak test and functional testing, both of which cannot be done until the SI accumulators are restored, which is presently scheduled for after the Integrated Leak Rate Test (ILRT).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 55

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications:
Modification 95-035 - modify Containment Spray additive tank controller circuit.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Independent Review Results:

Although the use of a Safety Evaluation screening is appropriate, the basis for the screening lacked substance regarding the impact of the wiring change (i.e., screening did not discuss why the wiring change would not affect the valve position, the safety significance of the output indication, or what the impact of going from a parallel circuit to a series circuit has on the controller). Restart Commitment Item # 17 will review Safety Evaluation screenings performed in 1996 to identify and resolve weaknesses and inconsistent trends generic to the screenings. No action is required under commitment item #55 to resolve this issue. In addition, the write-up discussion in Section D incorrectly referenced the valve as 2SI-8831A instead of 2SI-831A. The RE has been notified of the errant valve number in order to make a pen and ink change.

During stroke testing of the 2SI-836A and 2SI-836B valves the Ops Engineering noted in step 4.2.7 of the IWP that when the valve controller was in manual mode and then placed in the normal position and closed, the valve closed and then bounced partially open (20% and 30%). The test was repeated in the automatic mode and performed satisfactorily. I & C investigated the manual test and noted that a capacitor discharge while it was turned off was the cause. The IWP did not indicate that a successful manual test was achieved. This IWP step was discussed with the Operations Coordinator. It was a concern that the condition which caused the valve to bounce to a semi-open position did not have a corrective fix or explanation as to why this was acceptable. Operations and I & C departments have been notified of the concern with this issue. Resolution of this issue needs to be completed for Unit 2 restart. The Operations and I & C departments need to resolve the concern regarding the manual stroke test of valve 2SI-836A and 2SI-836B prior to Unit 2 exiting Cold Shutdown.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 56

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications:
Modification 96-063 - replace 345 kv breakers (3-4, 4-5, and 142).

During extremely cold winter conditions, these switchyard breakers experienced air loss, making them difficult to operate. This replacement will ensure their operability during these conditions.

Completion Timing: The physical work associated with this modification should be completed prior to criticality. To conduct the PMT (which involves relaying checks), the unit must be on-line.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 56).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

The modification package (MR 96-063), 50.59 Safety Evaluations, and Installation Work Plan 96-063-01 were reviewed. The modification Final Design Documentation was incomplete and did not identify specific acceptance items in the Document Update Sheet (DUS). The incomplete DUS identifies that pen & ink changes to the Control Room Drawings and Master Data Book changes are required as acceptance items. The RE could not specifically identify which documents will require changes but has indicated that they will be identified in the near future. Therefore, changes to these documents could not be verified. The RE needs to complete the Control Room drawings and Master Data Book updates as an acceptance item to MR 96-063.

The Site Engineer following the installation/testing of the modification, has signed off IWP 96-063-01 identifying that the items needed for final acceptance are complete. The acceptance items identified in the IWP are revision to procedure PC-21 and ARB C02 E-4-8. The revised procedures have been verified to be issued in the controlled manuals. Additional acceptance items may be required for final acceptance based on the completion of the DUS by the RE. The Site Engineer has been informed that additional acceptance items may be required prior to DSS sign off and the IWP package should be held back. A Condition Report should be initiated to identify and track this concern.

A 50.59 safety evaluation was performed to evaluate the replacement of the Unit 2 Generator breaker (2F52-142) and addition of test switches. An additional Safety Evaluation screening was performed to evaluate the testing of the breakers and circuits. The Safety Evaluation/screening matched the Modification description and Installation Work Plan in content. Additional scope (installation of breaker and test switch wiring changes) was included in the Safety Evaluation for completeness and convenience. As previously identified, the installation of the breakers was performed by a separate business unit of Wisconsin Electric, but has direct impact on plant operation. Changes to the Control Room test switch wiring was performed by WE under a separate installation document unrelated to MR 96-063. This separate scope appears to have been performed under a WO Work Plan. IWP 96-063-01 relies on the test switches being installed in order to test the breakers. Review of the Work Plan for the test switch installation needs to be completed to assure that any acceptance items (SQUG review of panel, Control Room drawing updates, etc.) associated with the installation have been completed.

Status:

The physical work is completed, and the modification is awaiting PMT. To conduct the PMT (which involves relaying checks with the generator breaker closed and energized), the unit must be on-line. A procedure update to PC-21 must also be made to allow acceptance of this modification.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 57

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 96-069 - replace four breakers (1Y-06-01, 1Y-06-03, 1Y-06-05, and 1Y-06-11) associated with instrument bus 1Y-06.

This will resolve an issue where these breakers are oversized for the wiring they are protecting, creating a potential delay or lack of breaker tripping situation should a fault occur.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 57).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

The Safety Evaluation (SER 97-032) had pen and ink changes made to change the word "shutdown" to "hot or cold shutdown" condition. This change was not made consistently in the 50.59 evaluation. The response for Question 2 & Question 6 did not have the pen and ink changes made consistent with the other question responses. The Technical Specifications define Hot Shutdown based on $T_{ave} > 540F$ and Cold Shutdown based on $T_{ave} < 200F$. Based on the Station Log, this modification was installed during a phase between hot and cold shutdown when T_{ave} was approximately 345F. The Work Plan initial conditions required the Reactor to be offline. The Unit 1 condition and installation activities were discussed with the on-site RE and Operations. It was noted by both the RE and Operations that installation could be performed during any condition while the Reactor was shutdown. The Safety Evaluation discussion of the Unit 1 Plant condition, by definition, does not match the condition in which the installation was performed or that which was required by the Work Plan. However, this does not represent a safety issue and will not impact Unit 2 restart. The on-site RE was made aware of this issue and was asked to take the necessary action to resolve the conflict. It was recommended that the RE discuss this issue with the MSS which approved the 50.59 to assure the intent of the pen and ink change was not made to avoid installation during the transition from hot to cold shutdown. In addition, it was suggested that the 50.59 evaluation be revised to identify the installation condition as reactor shutdown.

Verification of pen and ink changes to the Control Room/WCC documents was performed. The Document Update Sheet (DUS) identified that the only acceptance item for MR 96-069*A was pen and ink changes to the MDB 3.2.11 for the 1Y06 panels. These changes have not been made to the MDB in either the WCC or Control Room. These changes should have been made prior to the modification being accepted by the DSS and returned to service. The RE has been notified of this issue and needs to complete the pen and ink changes prior to Unit 2 restart.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 58

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 95-058*O - repair Steam Generator intermediate leg supports. These were found degraded, and this issue may be resolved through analysis.

Completion Timing: This should be in an accepted status prior to the Unit 2 approach to criticality.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 58).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

This is awaiting PMT (hot gap measurements), which will occur when the unit is heated-up and prior to criticality.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 59

Commitment Description: The following modification will be in an accepted status (i.e., the applicable physical work completed, post-maintenance and return to service testing completed satisfactorily, and the associated component/system being declared operable) prior to being required to be operable per Technical Specifications: Modification 96-070 - replace molded case circuit breakers associated with instrument buses 2Y-05 and 2Y-06.

This will resolve an issue where these breakers are oversized for the wiring they are protecting, creating a potential delay or lack of breaker tripping situation should a fault occur.

Completion Timing: This should be in an accepted status prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. The modification is in an accepted status.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the completed Installation Work Package.
 - A summary of the significant items/issues identified during conduct of the modification and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 59).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the copy of the Installation Work Package page.
 - Significant items/issues identified during conduct of the modification are being tracked in a tracking system which is being reviewed per Restart Commitment #22.

4. Completion of an independent verification.

Independent Review Results:

The Safety Evaluation screening had minor discrepancies with the modification final design and Work Plan. The screening incorrectly referenced action item #2 to Condition Report CR 96-539 instead of action item #1. This CR only has one action item. The safety evaluation screening noted that separate Work Plans would be created for each of the six breakers which are replaced. This was not done. Two Work Plans were created for MR 96-070; one to control the breaker replacements on the Y-05 panel, and another to control the breaker replacements on the Y-06 panel. These discrepancies do not change the results of the 50.59 screening or create a safety issue. The RE has been notified of the discrepancies and has been directed to make the appropriate pen and ink changes to the original documents.

Verification of pen and ink changes to the Control Room/WCC documents was performed. The Document Update Sheet (DUS) identified that the only acceptance item for MR 96-070 was pen and ink changes to the MDB 3.2.11 for the 2Y05 and 2Y06 panels. These changes have not been made to the MDB in either the WCC or Control Room. These changes should have been made prior to the modification being accepted by the DSS and returned to service. The RE has been notified of this issue and needs to complete the pen and ink changes prior to Unit 2 restart.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 60

Commitment Description: The work and testing associated with these work orders will be completed prior to the associated component/system being declared operable: Work Orders 9601506, 9602502, 9603921, 9611267, 9611278, and 9611755 - replace proximity switches and targets with an improved design and overhaul the Fuel Transfer Cart to enhance control system operation.

The original equipment manufacturer had provided switches not designed for underwater service, causing a history of recurring failures. This will resolve a workaround issue.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Independent Review Results:

It should be noted that WO 9603921 and WO 9611278 both perform work on the idler sprocket. It appears that there could have been repeat or related maintenance performed on the idler sprocket which may not have been evaluated for lessons learned.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 61

Commitment Description: The work and testing associated with these work orders will be completed prior to the associated component/system being declared operable: Work Orders 9613568 and 9613569 - provide bonnet pressure locking relief for the SI-857A and SI-857B valves (interface valves between RHR and High Head SI) on Unit 2. These are critical, manually operated valves.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work orders.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work orders.
 - A summary of the significant items/issues identified during conduct of the work orders and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #61).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work orders.
 - Significant items/issues identified during conduct of the work orders are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

Reviewed Design Input Checklist. For C.1.b, the design pressure is specified as 300 psig. This should be 700 psig. This was noted to the RE and corrected. The hydrostatic and

inservice leak test data sheets correctly show the 700 psig design pressure and 875 psig hydro pressure. Also, the F.2.p/r/s items should be F.1.p/r/s. These items are editorial.

Two Engineering Change Requests (ECRs), 97-0006 and 97-0010 were generated in support of this modification. Both of these ECRs represented minor changes to the design (alternate tube union type and alternate Girard clamp mounting) and did not impact the scope of this modification. Both of these ECRs were originally QA-scope, but were changed to Non-QA scope. The QA-scope designation is more appropriate. ECR 97-0010 gives alternate tube unions that can be used. Both the original and alternate unions are QA-scope. ECR 97-0006 provides alternate attachment methods for Girard clamps. If these ECRs are QA-scope, a technical review will be required.

Status:

The physical work has been satisfactorily completed, and PMT (IT-45) is scheduled to occur prior to core loading.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 62

Commitment Description: The work and testing associated with this work order will be completed prior to the associated component/system being declared operable: Work Order 9611757 - correct the leakage which leads to boric acid buildup in the cylinder blocks of "B" Charging Pump.

This is a housekeeping issue, not an operability issue. Resolution will bring this into compliance with Maintenance Department housekeeping standards.

Completion Timing: The physical work will be completed prior to Unit 2 leaving cold shutdown. PMT requires that the pump be run prior to turbine roll-up.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work order.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work order.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #62).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work order.
 - Significant items/issues identified during conduct of the work order are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

The physical work associated with this work order has been completed, and it is awaiting PMT (run the pump prior to turbine roll-up).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 63

Commitment Description: The work and testing associated with this work order will be completed prior to the associated component/system being declared operable: Work Order 9603532 - repair the handswitch for 2P-2A, the "A" Charging Pump.

This handswitch has a history of not operating smoothly, and this was addressed in the past through the use of lubricants. A change in maintenance philosophy prompted the replacement of this component.

Completion Timing: The physical work should be completed prior to Unit 2 leaving cold shutdown. The PMT will be completed prior to criticality.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work order.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work order.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #63).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work order.
 - Significant items/issues identified during conduct of the work order are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

The Work Order's functional test is noted on the Return to Service Testing Reviews form, but not in the work plan. The test should be added to the Work Plan to ensure it is performed. The Work Order process should update the Work Plan when testing specified in the Return to Service Testing Reviews form is not already included in the Work Plan. The Work Order process should be evaluated to ensure testing identified in the Return to Service Testing Reviews form is covered appropriately in the Work Plan.

Status:

The physical work is complete, and the work order is awaiting PMT (running the pump during OP-4A).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 64

Commitment Description: The work and testing associated with these work orders will be completed prior to the associated component/system being declared operable: Work Orders 9611624 through 9611626 - replace existing pneumatic turbine generator circuitry time delay relays with plug-in, electronic time delay relays.

The ease of calibration and cycle drift will be improved through this change.

Completion Timing: The physical work should be completed prior to Unit 2 leaving cold shutdown. The PMT will be completed while on-line.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work orders.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work orders.
 - A summary of the significant items/issues identified during conduct of the work orders and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #64).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work orders.
 - Significant items/issues identified during conduct of the work orders are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

The independent review has not yet been conducted.

Status:

The work plans have been prepared, and the work order is scheduled.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 65

Commitment Description: The work and testing associated with this work order will be completed prior to the associated component/system being declared operable: Work Order 9606626 - reinstall switches on the Unit 2 Containment hatch third door to allow monitoring of door status.

There have been recurring human performance errors associated with this door, as people would block it open during refueling operations to transfer equipment. To ensure the operability of this door, switches are being installed to allow remote monitoring of its status.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Independent Review Results:

No discrepancies noted.

Status:

Verified closed. The associated documentation was provided to the NRC.

OTK

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 66

Commitment Description: The work and testing associated with this work order will be completed prior to the associated component/system being declared operable: Work Order 9611052 - replace the 2P-10B handswitch, the "B" RHR Pump control switch.

This handswitch has a history of not operating smoothly, and this was addressed in the past through the use of lubricants. A change in maintenance philosophy prompted the replacement of this component.

Completion Timing: This should be completed prior to the Unit 2 core loading.

Independent Review Results:

One item in the Work Order has not been resolved: to initiate the Drawing Change Notice (DCN) for conflict between schematic (499B466, Sheet 337) and wiring diagram (E-1591E-B) for contacts C6-C7 and D6-D7 (NUTRK U2R22 RESTART Action #89).

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 67

Commitment Description: The work and testing associated with these work orders will be completed prior to the associated component/system being declared operable: Work Orders 9611198 and 9611199 - repair the body-to-bonnet boric acid leak on CV-307 B (lowside tap for "B" RCP #1 seal d/p) and CV-308B (lap seal d/p for "B" RCP).

This is a housekeeping issue, not an operability issue. Resolution will bring this into compliance with Maintenance Department housekeeping standards.

Completion Timing: This should be completed prior to the Unit 2 approach to criticality.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work orders.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work orders.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #67).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work orders.
 - Significant items/issues identified during conduct of the work orders are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

The physical work is complete, and the work order is awaiting PMT (a visual leak check to atmosphere during the conduct of IT-235).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 68

Commitment Description: Repair valve AR-3511 per Work Order 9513340. The Unit 2 priming air ejector is blank flanged due to air in-leakage through the condenser air removal isolation valve, AR-3511. This resolves a workaround issue.

Completion Timing: The physical work should be completed prior to the Unit 2 approach to criticality. The PMT will be completed prior to being on-line.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work order.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work order.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #68).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work order.
 - Significant items/issues identified during conduct of the work order are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

In step 2 of the Work Plan, the Lot Number for the flange gasket does not match the storeroom requisition forms.

Status:

The physical work associated with this work order is complete, and it is awaiting PMT (a general leak test during the conduct of OP-13A).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 69

Commitment Description: Repair the drain valve for the heating steam moisture separator per Work Order 9613451.

The Unit 2 heating steam moisture separator level has been difficult to maintain during normal operations. Frequent Main Control Board alarms have been received due to low level, countering the station's attempt to maintain a black board policy. This will be tested following Unit 2 startup.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work order.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work order.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #69).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work order.
 - Significant items/issues identified during conduct of the work order are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

The independent review has not yet been conducted.

Status:

The physical work associated with this work order is scheduled.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 70

Commitment Description: Install a new level control system for the brine tank (T-118) per Modification 92-008*Q.

The tank overflows because the installed automatic level control system is not effective, and there is no high-high level alarm for the tank. This has been a recurring human performance issue exasperated by design. This modification will minimize the human performance challenges.

Completion Timing: This should be in an accepted status prior to the Unit 2 approach to criticality.

Independent Review Results:

No discrepancies noted.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 71

Commitment Description: Repair MS-249, the Unit 2 steam line sample valve, per Work Order 9603128.

This valve had a packing leak, which required steam header sampling to be shifted to the B steam header. This repair will restore the ability to sample normally and resolves a workaround issue.

Completion Timing: The physical work should be completed prior to the Unit 2 approach to criticality. The PMT will be completed prior to being on-line.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work order.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work order.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #71).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work order.
 - Significant items/issues identified during conduct of the work order are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

The physical work is complete, and the work order is awaiting PMT (general leak test during OP-13A).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 72

Commitment Description: Repair alarm switch 2LS-2511 per Work Order 9605711. The Unit 2 D MSR level was being maintained low in the band due to level oscillations and a steam leak from the alarm switch.

Completion Timing: The physical work should be completed prior to Unit 2 leaving cold shutdown. PMT needs to be conducted at power.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work order.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the closed work order.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #72).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work order.
 - Significant items/issues identified during conduct of the work order are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

The Work Order has been installed, and return to service testing has been performed, except the leak check and verification of level indication. 2LS-2511 is the high level alarm switch for 2HX-22D MSR. It appears that the testing specified in the Work Plan (verification of level indication) was intended for a level gauge, not a level switch. The

testing specified is not adequate. The testing and acceptance criteria for the functional testing of the level switch need to be expanded.

Status:

The physical work is complete, and the work order is awaiting FMT (leak test at power).

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 73

Commitment Description: Repair 2P116, the Unit 2 Boric Acid Recirculation Pump, per Work Order 9603130.

There have been recurrent, significant seal leaks due to the pump's design and application. This work order replaces the current pump with a seal-less pump.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the work associated with the listed work order.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator.
 - A copy of the closed work order.
 - A summary of the significant items/issues identified during conduct of the work order and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action #73).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documentation which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Duty Shift Supervisor's signature and date is on the "Equipment Return to Service" section on page 2 of the associated work order.
 - Significant items/issues identified during conduct of the work order are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

The independent review has not yet been conducted.

Status: 13-13-13-13-13-13

The physical work is scheduled.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 74

Commitment Description: Each operating crew will receive simulator training to gain proficiency in casualty response, the expected response of the newly installed steam generators and reactor core, and placing the turbine on-line.

This simulator training will consist of :

- Bringing the turbine on-line (from no load on the turning gear to about 15% power).
- Reviewing the differences in steam generator response between Units 1 and 2.
- Conducting normal trips and identifying the differences in response between Units 1 and 2.
- Addressing instrument failure response differences between Units 1 and 2.
- Conducting casualty response dynamic scenarios.

Completion Timing: This will be completed prior to the Unit 2 approach to criticality.

Independent Review Results:

During this simulator session, the following observations were discussed which may warrant further discussion and follow-up action by the Operations staff.

During the turbine roll and generator on line exercise, there were only two operators on the console and three really active stations. One operator was in charge of the turbine and steam generator water level control (SGWL) while the other operator was in control of the reactor. During this critical evolution, it would seem more appropriate to have these stations split among three operators to minimize the distractions and provide more focused attention to these critical stations. Discussions with the Operations Manager, who was also observing this training, indicated that real plant start ups do involve extra operators on the control board who are brought out on overtime.

The operator controlling the turbine and SGWL had to turn his back to the control board to find adequate level trends that would support his needs in controlling S/G water level. The CRT which had these trends available on the vertical control board facing the operator had degraded to the point that it was too difficult to read. From discussions, the trending CRT in the vertical panel in the actual control room does provide adequate indication. While the operator appeared to handle the added burden of operating both stations (turbine and SGWL) and working around the degraded indications of vital parameters, there is some concern for the impact of training in a manner that is not

consistent with the manning and equipment status that exists in the actual control room. It is noted that subsequent to this observation, this reviewer became aware of Enforcement Conference Commitment Item No. 21. This commitment requires consideration for improvements to the Control Operator's Work Station that would permit the operators to face the main control boards and have optimum access to the controls.

While there are observations noted on the need to keep the operator positioned to control the plant and to maintain the fidelity between the simulator training and the actual practices in the Control Room, these observations are for consideration by the PBNP staff and should not hinder satisfactory completion of this commitment.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 75

Commitment Description: Revise the initial and requalification operator training plans to include a review of the administrative procedures identified as significant to daily operation of the plant during each two year operations training plan.

This commitment is also Enforcement Conference Commitment Item # 20.

Completion Timing: This should be completed prior to the Unit 2 approach to criticality.

Criteria to Closeout This Item:

1. Completion of the task defined in the "Commitment Description" section.
2. The Responsible Person has forwarded the following to the Enforcement Conference Commitments Coordinator:
 - A copy of the initial and requalification operator training plans which includes a review of the administrative procedures identified as significant to daily operation of the plant during each two year operations training plan.
 - When the actions described in the "Commitments Description" section were completed (report using the NUTRK system).
 - Significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system).
3. The Restart Issues Coordinator or the Enforcement Conference Commitments Coordinator have verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Enforcement Conference Commitments Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

A list of administrative procedures that are significant to daily plant operation has not yet been identified.

The commitment as presently written does not appear to be satisfied by what is documented in the file. The recommended action is to either complete the commitment as written, or revise Restart Commitment No. 75, to reflect that action has commenced to achieve closure and that full compliance will be achieved by a reasonable future date.

Status:

Verified closed. The associated documentation was provided to the NRC.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 76

Commitment Description: Conduct roundtable discussions with all MSS\SS\DTA personnel regarding conservative decisionmaking, Technical Specification interpretations, and lessons learned from recent regulatory communications and perspectives. Review outlier Technical Specification interpretations for interim applications.

Completion Timing: This should be completed prior to the Unit 2 fuel loading.

Independent Review Results:

No discrepancies yet noted.

Status:

Verified closed. The associated documentation was provided to the NRC.

ORIGINAL ARTICLES

THE EFFECT OF VITAMIN DEFICIENCY ON THE
GROWTH OF THE RAT
J. H. H. SMITH, JR., and J. H. H. SMITH, JR.
The effect of vitamin deficiency on the growth of the rat has been studied by Smith and Smith. They found that a deficiency of vitamin A resulted in a marked retardation of growth. This was observed in rats fed a diet deficient in vitamin A. The growth of these rats was significantly slower than that of rats fed a diet containing adequate amounts of vitamin A. The authors conclude that vitamin A is essential for normal growth in the rat.

THE EFFECT OF VITAMIN DEFICIENCY ON THE
GROWTH OF THE RAT
J. H. H. SMITH, JR., and J. H. H. SMITH, JR.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 77

Commitment Description: Complete the procedure changes and training associated with the new Technical Specification on ECCS regarding the new Containment Integrity Analysis.

This involves the implementation of Technical Specification Change Request 192.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the procedure changes and training defined in the "Commitment Description" section.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A copy of the revised procedures.
 - A summary/document describing what was covered in the training (report using the NUTRK system - NUTRK U2R22 RESTART Action # 77).
 - Copies of the attendance sheets for the training.
 - Significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 77).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

This is in progress. Training and procedure work have commenced. Further training (as needed) will be conducted when the final content of the Technical Specification Change is known and the procedure changes have been finalized.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 78

Commitment Description: Communicate specific expectations regarding AFW and EDG status control to Operators.

When the P-29 TDAFP should be declared operable has caused confusion, since the ability to FULLY test it for flow is not available until after reactor criticality. That delay in achieving a full flow test has been a confusing point. The Technical Specifications and procedures are adequate.

The AFW status control issue involves AFW pumps tripping on overcurrent when the EDG's are lightly loaded and in an overfrequency condition.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the communication of specific expectations defined in the "Commitment Description" section.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A summary/document describing what was covered in the communications (report using the NUTRK system - NUTRK U2R22 RESTART Action # 78).
 - Significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 78).
3. The Restart Issues Coordinator has:
 - Verified that the Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Verified that the significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
 - Determined that all Operators were informed of these expectations.

4. Completion of an independent verification.

Independent Review Results:

An "Operations Notebook" memo was issued on 2/11/97 by the Responsible Person for this restart commitment. The subject of this memo is "Motor Driven Aux Feed Pump flow control" and there is a sign off documentation requirement for those required to read this memo. The content of the memo discusses required training on SOER 96-01, "Control Room Supervision, Operational Decision-Making, and Teamwork", in cycle 97-1. It also discusses AFW throttling requirements to prevent AFW pump trip from overcurrent. The commitment to communicate specific expectations regarding when and how to declare the Steam Driven Auxiliary Feedwater Pump (P-29) operable does not appear to be addressed in this memo.

It is not clear why the condition of the motor driven pump tripping is not a degraded design condition outside the conditions assumed in the PBNP Safety Analysis and Licensing Basis, specifically the NRC Safety Evaluation Report's that reviewed the PBNP responses to NUREG -0737 II.E.1.1 and II.E.1.2 requirements. If this is indeed a degraded design condition, then the Technical Specification Limiting Conditions for Operation for the Auxiliary Feedwater Pumps are adversely impacted and need to be promptly addressed. Previous safety evaluations (SER 96-023 and SER 96-028) and an Operability Determination 96-264 do not adequately address this potential degraded design against the PBNP's Licensing Basis.

Additionally, the memo discusses the need to throttle flow to 150 gpm or less when the recirc valves are open. This instruction, which is being incorporated into procedures, does not address core cooling requirements and appears to require throttling below that which may be needed in some scenarios. The FSAR indicates this system (the motor driven AFW supply) has a capacity of 400 gpm. This operating instruction would limit this capacity to 350 gpm under some conditions. The core safety implications and this reduced capacity from that assumed in the FSAR need to be addressed by a thorough 50.59 Safety Evaluation.

Status: This is in progress.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 79

Commitment Description: Restore a proceduralized capability to operate the Containment Spray Pumps in the recirculation mode of the ECCS. This will be included procedurally in the EOP package.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the task defined in the "Commitment Description" section.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - A summary addressing when the actions described in the "Commitments Description" section were completed and what specifically was done to accomplish the task (report using the NUTRK system - NUTRK U2R22 RESTART Action # 79).
 - Documents initiated or changed as a result of this task. The identification number for each of these must be included in this summary, and a copy sent to the Restart Issues Coordinator for inclusion in the Restart Issues File.
 - Significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 79).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

Procedure CSPZ.1 is being drafted to address an RHR pump supplying CS and core deluge alone.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 80

Commitment Description: Obtain amendments requested by Change Requests 188 and 189 related to Steam Generator replacement; 192 related to Service Water operability; and 194 related to Low Temperature Overpressurization limits. This will include resolution of issues related to Control Room and offsite dose evaluations for the analyzed events.

Completion Timing: This should be completed prior to Unit 2 leaving cold shutdown.

Criteria to Closeout This Item:

1. Completion of the task defined in the "Commitment Description" section.
2. The Responsible Person has forwarded the following documentation to the Restart Issues Coordinator:
 - When the actions described in the "Commitments Description" section were completed (report using the NUTRK system - NUTRK U2R22 RESTART Action # 80).
 - A copy of the amendments.
 - Significant items/issues identified during conduct of this task and how they were resolved (can simply reference Condition Report numbers or other tracking mechanisms) OR a statement that there were none identified (report using the NUTRK system - NUTRK U2R22 RESTART Action # 80).
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

This is in progress.

- Technical Specification Change Request 194 was approved by the NRC on February 20, 1997 and has been implemented as Amendment Number 172 (Unit 1) and Amendment Number 176 (Unit 2).
- LOCA dose calculations to support Technical Specification Change Requests 188, 189, and 192 have been provided to the NRC.
- A team has been formed to address control room ventilation dose concerns with the Operators. A meeting was held on April 28, 1997 with the NRC to address the control room habitability issue, which may become a critical path issue for the outage.

Point Beach Nuclear Plant Unit 2 Restart Commitment Summary (May 1, 1997)

Commitment ID#: 81

Commitment Description: Submit the following requests for license amendments resulting from the review of existing Technical Specification interpretations:

- Revise the maximum acceptable power level when crossover steam dumps are inoperable (TS 15.3.4.E).
- Revise requirements for offsite power lines availability to address adequacy (TS 15.3.7.A.1.a).
- Remove allowances in TS 15.3.1.A.1.a for single reactor coolant pump operation.
- Appropriately modify the minimum required boron concentration in the Refueling Water Storage Tanks.

Completion Timing: This should be completed prior to the Unit 2 approach to criticality.

Criteria to Closeout This Item:

1. Completion of the task defined in the "Commitment Description" section.
2. The Responsible Person has forwarded to the Restart Issues Coordinator a copy of the requests for the license amendments.
3. The Restart Issues Coordinator has verified that the:
 - Restart Issues File includes the documents which the Responsible Person is required to forward to the Restart Issues Coordinator (see immediately above).
 - Significant items/issues identified during conduct of the review are being tracked in a tracking system which is being reviewed per Restart Commitment #22.
4. Completion of an independent verification.

Independent Review Results:

No discrepancies yet noted.

Status:

This is in progress:

- The crossover steam dump/turbine overspeed request, Technical Specification Change Request 196, has been submitted to the NRC.
- The request to eliminate provisions for single RCP operation while critical, Technical Specification Change Request 198, has been submitted to the NRC.
- Offsite power availability changes are being discussed with analysis personnel since the present study does not support an amendment request.
- The RWST boron concentration request was submitted to the NRC.

***** Responsible Person:
* Trkid: U2R22 RESTART * Urgency: DONE
* Action Number: 8 * Work Priority: 99

Activity Pending is: DONE

ASSOCIATED WITH A COMMITMENT

-----TITLE AND TASK DESCRIPTION-----

Unit 2 Refueling 22 Startup Commitments

Review 20% of the Operations Technical Specifications (TS), Inservice Tests (IT), Operations Refueling Tests (ORT) surveillance procedures, with concentration on those involving major equipment. Upgrade as necessary to include appropriate initial conditions, return to service lineups, properly specified independent verification, reviewing acceptance criteria, and Technical Specification implementation.

-----DATES-----

Source Record: 01/10/97	***** Evaluation *****	***** Correction *****
Commitment:	Eval Due:	Corr Act Due: 04/25/97
Action Create: 01/10/97	Orig Eval Due:	Orig CA Due: 02/11/97
Action Closed: 05/01/97	Eval Done:	Corr Act Done: 04/24/97

-----PEOPLE-----

Responsible for Overall Action: OPS
Responsible for Current Pending Activity:
Issue Manager:
Initiator:
Punchlist Administrator:

-----UPDATE-----

(01/21/97) Review of ORTs complete with necessary drafts submitted. 100 ORTs total with 21 procedures reviewed. Specific ORTs reviewed were: ORT 3, ORT 6, ORT 9 APP. C, H, M, S, + X, ORT 11, ORT 28, ORT 33, ORT 37, ORT 43, ORT 48, ORT 53, ORT 58, ORT 65, ORT 68, ORT 73, ORT 78, ORT 83, ORT 85. Of these three changes were required. ORT 10 which is the restoration of ORT 9 appendices required two changes as a result of caps that were removed in ORT 9 appendices and were not replaced during restoration. ORT 6 also required changes for independent verification of electrical alignments made during the procedure. Review of other IT and TS procedures still in progress.

(01/23/97) Review of Technical Specification (TS) surveillance tests complete. Total procedures number 46 with 10 reviewed. Procedures reviewed are: TS-4A, TS-9TS-10A U2, TS-32, TS-38, TS-42, TS-71, TS-76, TS-80, + TS-84. Previous reviews of these procedures occurred prior to use as required by PBM 96-0256. Two procedures, TS-10A U2 and TS-38 previously under revision due to other commitments and reviews. TS-9 requires revision to provide better reference to applicable Technical Specification. Requirements sent to Crew E for resolution. Reviews of ITs still in progress.

(01/29/97) Status update that was provided to NRC, on 1/24/97 Lysle Mtg:

Of the four Restart commitments that required a random 20% review, this is one that will not only get the 20% review, but will get a 100% review in support of an associated Enforcement Conference commitment. This review includes ORTs, TSs, ITs and OPs.

21 of 100 ORTs (total population) were reviewed. 3 changes required. 10 of 46 TSs (total population) reviewed. 3 changes required. Of these 3 required changes, 2 of them were identified as part of an on going review process for this scope, that was put into effect in 9/96 (this was the SRO review sheet process). This practice has been formalized (proceduralized) in NP 8.1.1.

This enforcement conference commitment is due 9/30/97. The following target dates are set to establish a production schedule (100% population reviews): ORTs 3/31/97 OPs 5/31/97 ITs 9/30/97 TSs 9/30/97.

AN INDEPENDENT NTRK ITEM NEEDS TO BE CREATED TO INCORPORATE THE SCOPE OF THIS COMMITMENT (INITIAL CONDITIONS, RETURN TO SERVICE LINEUPS, ETC) INTO THE APPROPRIATE WRITERS' GUIDE FOR PROCEDURE DEVELOPMENT SO THAT THE STANDARDS AND EXPECTATIONS ARE ESTABLISHED FOR FUTURE PROCEDURE CREATION.

(01/29/97) No significant difference in status since 1/24/97.

(01/30/97) IT reviews complete for selected Unit 2 and common procedures. Drafts yet to be completed and submitted. Procedures reviewed include: IT-04, IT-06, IT09A, IT-13, IT-18, IT-45, IT-85, IT-115, IT-215, IT-255, IT-285, IT-295, IT-295B, IT-305A, IT-325, IT-385, IT-505, IT-525B, IT-535B, IT-536, IT-585, IT-605, IT-745, IT-765, IT-1075, IT-1125 part 1, IT-1125 part 2. Total procedures reviewed was 27 of 67 Unit 2 and common IT procedures. Summary of changes: Return to service lineups require 2 procedures to be changed. Both are shutdown procedures, one with a temp change change in place, the other relied upon DSS specified alignment. Review of properly specified independent alignment requires 8 changes. These are mostly shutdown procedures which rely upon checklists to be completed prior to startup and an independent check of red locks. Both of these items have been added as requirements for proper independent verification as a result of this review and will be added to OM 3.17, "Independent Check Guidelines". Review of Acceptance Criteria will require 3 changes due mostly to Startup Commitment item 10 where procedure changes have yet to be made for the incorporation of design basis accident analysis requirements. Review of Technical Specification implementation will result in 2 procedure changes to replace the reference to TS 15.4.4 with reference to the containment leakage rate program basis document. This was recently changed to implement 10 CFR 50 Appendix J Option B.

(02/06/97) All changes have been drafted for this item and are in the review/approval process.

(02/11/97) Changed the Due Date from: 02/11/97 to 02/28/97
U2 Start-up is scheduled for mid March. Procedure changes have been identified and are in various stages of review/approval. Due date extended for procedure issuance.

(02/28/97) Changed the Due Date from: 02/28/97 to 03/28/97
Start-up has been delayed until April. Various procedures are still in the review and approval process. Due date extended to allow for procedure issuance.

(03/27/97) Changed the Due Date from: 03/28/97 to 04/25/97
There are seven procedures left to be issued prior to restart. Start up of unit 2 is expected in mid-May. Due date changed to accomodate procedure final review and issuance.

(04/15/97) Passed to for acceptance of work.

(04/24/97) Passed to for Verification.
All procedures reviewed with corrective actions have been issued. Item closed.

(04/30/97) Passed to for Final Close Out.
Procedures changed included: IT 4, 13, 115, 215, 325, 525B, 535B, 536, and 585; ORT 3A, 6, 9A, and 10A; and TS 10A. No significant issues were identified during conduct of the review. This item is ready for closeout.

(05/01/97) PLA Closure of Item.

-----REFERENCES-----

IT-04	IT-13
IT-115	IT-215
IT-325	IT-525B
IT-535B	IT-536
IT-585	TS-10A
ORT 3	ORT 6
ORT 9A	ORT 10A

-----MISCELLANEOUS-----

Originating Agency:
NRC Open Item Number:
Related Outages: U2R22
Engineering Work Type: None Specified
Person Hours: Original Estimate =
Current Estimate =
Actual Hours =

System: XX
NRC Status: