



**Wisconsin Electric** POWER COMPANY

231 WEST MICHIGAN, MILWAUKEE, WISCONSIN 53201

July 22, 1981

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

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301  
RESPONSE TO  
IE INSPECTION REPORT NOS. 50-266/81-10 AND 50-301/81-11  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Pursuant to the provisions of 10 CFR 2.201, provided herewith is Licensee's response to those items of noncompliance identified in NRC IE Inspection Report Nos. 50-266/81-10 and 50-301/81-11 dated June 17, 1981.

The first of these events concerned Licensee's failure to inform the NRC Operations Center of a reactor trip on May 21, 1981. The trip occurred due to a low-low steam generator level in the "A" steam generator while maintaining level manually with the auxiliary feed pumps. Zero power physics testing, specifically performance of rod worth measurements, was being performed at the time of the trip. During performance of this testing, excessive feeding of the steam generators has to be avoided to prevent major fluctuations in reactor coolant system temperature. While maintaining steam generator levels manually, the level in "A" steam generator decreased more rapidly than the operator anticipated and the low-low steam generator level reactor trip occurred. The licensed operators in control of the reactor plant at this time had experienced similar evolutions many times in the past. A reactor trip under these physics testing, zero power conditions, was not considered by the reactor operators or the Shift Supervisor significant and reportable under the provisions of 10 CFR 50.72.

As discussed in our letter to you dated May 26, 1981, this event was not reported because the expressed intent of 10 CFR 50.72, as stated in the February 29, 1980 Federal Register notice, is to require immediate notification of "serious events that could result in an impact on public health and safety." Furthermore, IE Information Notice No. 80-02 stated that the general categorization of some of the event types listed in 10 CFR 50.72 had resulted in notification of events of less significance than was originally intended. The implication of this latter statement and the stated

8109100340 810811  
PDR ADCK 05000266  
Q PDR

JUL 24 1981

intent of the rule provides ample support and justification for our position that this specific incident was not reportable. Accordingly, we believe that this notice of violations should be withdrawn. We intend to further clarify, for the licensed operators, our position on this matter by revising our procedure DCS 1.12.1 to state that events resulting in actuation of the reactor protection system during zero power and low power startup evolutions are normally not reportable. This in no way would preclude our reporting to the NRC unusual events under these conditions which in our judgement have definite significance or that could potentially result in an impact on public health and safety.

The second item of noncompliance concerned the NRC-issued Order for Modification of License dated April 20, 1981. Section III, Paragraph 2, of the Order requires that prior to closing motor-operated valves as backup isolation for untested Event V check valve "procedures shall be implemented and operators trained to assure that the MOV remains closed." To comply with Section III, Paragraph 2 of the NRC Order, Special Order PBNP 81-02 was issued on May 19, 1981. This special order provided the necessary procedures to comply with the NRC Order. Training of licensed operators was considered to be complete after they had read, understood and initialed Special Order PBNP 81-02.

The PBNP NRC Resident Inspector, on May 21, 1981, determined that two shifts of operators which had operated Unit 1 after the motor-operated valves were tagged shut had not read Special Order PBNP 81-02. The NRC Resident Inspector also noted that the Control Operators were not on the routing for the special order.

Special Order PBNP 81-02 (attached) was available in the control room Special/Standing Order book for review by all licensed operators on and after May 19, 1981. There are no specific requirements, other than good watchstanding practice, for licensed operators to review the control room Special/Standing Order book prior to assuming the watch. However, a tag was affixed to the affected motor-operated valves' control switches which stated the following: "Do not open per Special Order PBNP 81-02." The tag affixed to the control switches provided notification to the operator of existing guidance concerning operation of the affected motor-operated valves.

Although the NRC Order dated April 20, 1981, was received by Wisconsin Electric on April 22, 1981, discussions with both NRR and I&E of the NRC on the application and acceptance of testing methods did not result in agreement until shortly before the deadline. This, along with one unit in refueling shutdown, had a detrimental effect upon completion of the above-noted requirement. Procedures to implement NRC Order Section III, Paragraph 2, were commenced on May 19, 1981, with the issuance of Special Order PBNP 81-02 and the tagging of the affected motor-operated valve control switches. Due to the timing of the implementation procedures

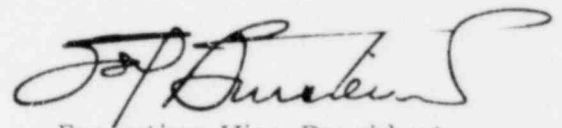
Mr. J. G. Keppler

-3-

July 22, 1981

with respect to the deadline date of the NRC Order and normal shift rotation, full compliance was not achieved until May 24, 1981, three days past the deadline date. We should point out, however, that the timely use of the tag procedure effectively accomplished the desired compliance.

Very truly yours,



Executive Vice President

Sol Burstein

Attachment

Subscribed and sworn to before me  
this 22nd day of July 1981.

Deborah Pleschmann  
Notary Public, State of Wisconsin

My Commission expires July 1, 1984.

Copy to NRC Resident Inspector

PBNP 81-02  
Revision 0  
05-19-81

Special Order

REACTOR COOLANT SYSTEM CHECK VALVES  
EVENT V ACCIDENT CATEGORY

Per the dictates of the recent NRC issued Modification of License dated April 20, 1981, with respect to reactor coolant system check valves within the scope of Event V accidents (intersystem LOCA), the following special instructions shall remain in effect until such time that Unit 1 is placed in the cold shutdown condition and these valves are appropriately tested in accordance with the above order.

The following normally closed valves (1MOV-878A&C; 1MOV-852A&B) shall not be opened during operation until such time that Unit 1 can be placed in cold shutdown and the above referenced check valves are tested per the above order.

A plain tag shall be affixed to each valve referencing this special order.

T. J. Koehler

A handwritten signature in black ink, appearing to read "T. J. Koehler". The signature is written in a cursive style and is positioned to the right of the typed name "T. J. Koehler".

ktw

cc: Mr. J. J. Zach  
Mr. R. E. Link  
Mr. T. J. Koehler (2)  
Mr. G. J. Maxfield/Training Admin.  
Mr. G. J. Maxfield/Operations Admin.  
Control Room  
Mr. G. A. Reed - Plant: 11.5.7.2