



Point Beach Nuclear Plant
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NPL 97-0328

10 CFR 2.201

June 4, 1997

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

Ladies/Gentlemen:

DOCKETS 50-266; 50-301
REPLY TO A NOTICE OF VIOLATION
NRC INSPECTION REPORT NOS. 50-266/97007 (DRS) AND 50-301/97007 (DRS)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter from Mr. John A. Grobe dated May 5, 1997, the Nuclear Regulatory Commission forwarded the results of a physical security inspection at our Point Beach Nuclear Plant conducted between March 31 and April 10, 1997. This inspection report included a Notice of Violation that identified two violations of NRC requirements.

We have reviewed the Notice of Violation and, pursuant to the provisions of 10 CFR 2.201, have prepared a written response, which is included as an attachment to this letter.

We believe that the attached reply is responsive to the Notice of Violation and fulfills the requirements identified in your May 5, 1997, letter.

If you have any questions or require additional information regarding this response, please contact me.

Sincerely,

Scott A. Patulski
Site Vice President

JE04Y

Attachment 9706110130 970604
PDR ADDCK 05000266
G PDR

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cc: NRC Regional Administrator
NRC Resident Inspector



DOCKETS 50-266 AND 50-301

REPLY TO A NOTICE OF VIOLATION

NRC INSPECTION REPORT 50-266/97007 (DRS) AND 50-301/97007 (DRS)

POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

During an inspection conducted between March 31 and April 10, 1997, two violations of NRC requirements were identified. Inspection Report 50-266/97007 (DRS) and 50-301/97007 (DRS) and the Notice of Violation (Notice) transmitted to Wisconsin Electric on May 5, 1997, provide details regarding the violations.

Section 3.F of Amendments 37 and 42 of the Facility Operating Licenses No. DPR-24 and DPR-27 for Units 1 and 2, respectively, requires the licensee to maintain in effect and fully implement all provisions of the Commission-approved Security Plans, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

Violation 1

"Paragraph 6.0 of Section 2.1 of the approved Point Beach Security Plan (PBSP) requires, in part, that an officer who is not assigned response duties, monitors outages of the intrusion detection system (IDS) by using closed circuit television (CCTV) or being present at the effected IDS alarm zone.

Contrary to the above, on February 4, 1997, for a period of 16 minutes an outage of Zone 10 of the IDS was not continuously monitored, nor was an officer posted at the effected IDS alarm zone. The operators of the Central and Secondary Alarm Stations failed to ensure that the effected alarm zone was monitored. This event was licensee-identified; however, previous corrective action to similar events did not prevent recurrence. This is a repeat violation (50-266/97007-02; 50-301/97007-02)

This is a Severity Level IV violation (Supplement III)."

Response to Violation 1

Reason for Violation

The event occurred as a result of distractions in a high workload environment. This situation led to the operator's failure to implement procedural guidance and checklists for severe weather compensatory measures. Additionally, central alarm station (CAS) and secondary alarm station (SAS) operators failed to adhere to accepted communications standards, which contributed to the failure to implement appropriate compensatory measures.

Corrective Actions Taken:

- A 30-day security Licensee Event Report, LER 266/97-S01-00, was submitted to the Commission on March 4, 1997. The report contains details surrounding the event, causes for its occurrence, corrective actions taken, and corrective actions to be taken.

Corrective Action 5 of the Licensee Event Report stated that the CAS operator involved in the event was relieved of CAS/SAS duties. The involved CAS operator is presently participating in a recertification program. Upon successful completion of written and oral examinations, the CAS operator will resume CAS/SAS duties.

Corrective Action 6 of the Licensee Event Report stated an engineering evaluation of our security system hardware would be completed by September 1, 1997. Our efforts to address the immediate Unit 2 restart issues, followed by the restart of Unit 1, have caused us to re-evaluate our ability to complete our engineering evaluation by this date. We now anticipate completion of our evaluation by October 31, 1997. During our recent evaluation of this and previous events, improvement of this equipment has been identified as being an important aspect of our overall corrective action plan. In addition, during our recent visits to other facilities, the need to improve our security system hardware was reinforced. Our current level of equipment workarounds and the number of alarms experienced by our system was found to be significantly greater than at other facilities.

- Wisconsin Electric senior management supported the use of a nationally recognized nuclear consultant to conduct a common cause evaluation of these CAS errors. This common cause evaluation was completed on May 6, 1997. The common cause evaluation considered security personnel errors that have occurred in the past two years. The purpose of the evaluation was to ensure that all reasonable actions that can be taken to reduce performance errors either have been taken or are scheduled to be completed. The evaluation identified the following as potential causes for the CAS errors:
 - o Human error traps continue to exist for the CAS operators.
 - o The technology, design, and condition of security detection and assessment equipment have increased the workload for the CAS operators. This results from the frequency of nuisance alarms and the requirement to implement workarounds.
 - o The majority of the program failures occur during storms or inclement weather that present the operators with high workload and time pressure conditions.
 - o During high workload and time pressure situations, the cognitive abilities of the CAS operators are stressed to a level that potentially increases the likelihood of errors.

The complete report, which we consider proprietary, is available for review by Commission representatives at Point Beach Nuclear Plant.

Previous Corrective Actions:

We believed that our previous evaluations of similar events and the subsequent corrective actions implemented in response to those events had accurately identified the causes and contributing factors. One of our identified corrective actions was a focus on reducing CAS operator distractions, but significant changes in the conduct of operations were not adequately considered. Additionally, the number of equipment workarounds resulting from aging security system hardware has been brought to the attention of senior management as a contributing factor to these events. Previously, replacement of security system hardware was maintained as a low priority within our evaluation and modification process.

Corrective Actions to be Taken:

- LER 266/97-S01-00 describes corrective action commitments previously docketed with the Commission.
- In addition to the commitments identified in the Licensee Event Report, review of the common cause evaluation is in progress. Corrective actions associated with reducing the high workload and distractions of the CAS and SAS operators are being developed. The review will be completed and an action plan will be developed by June 30, 1997.

Changes currently in progress, which will become part of our overall action plan, include adding a CAS/SAS supervisor. This individual will provide overall coordination and direction of CAS/SAS activities. The CAS/SAS supervisor will also prepare for and arrange for security support of plant activities, that currently would be handled by the CAS operator.

On April 2, 1997, a plant-wide initiative of reducing the use of Gai-tronics for routine communications was initiated. This reduced use of the Gai-tronics system has been successful in reducing the distraction for CAS/SAS operations.

Safeguards Information not necessary for CAS operation will be removed from CAS. Personnel traffic solely for the retrieval of this information will be eliminated, thereby further reducing the number of distractions that have hampered effective CAS operation.

Date Full Compliance Will be Achieved:

Full compliance with NRC requirements was achieved on February 4, 1997, when compensatory measures in response to the intrusion detection alarm zone outage were fully implemented.

VIOLATION 2

"Paragraph 3.4.1 of Section 2.4 of the approved PBSP requires, in part, that vehicles shall have the cab, engine compartment, undercarriage, and cargo area searched for unauthorized material upon entry into the protected area.

Contrary to the above, on April 3, 1997, an NRC inspector observed an inadequate search of a vehicle. The officer failed to search an easily accessible storage compartment located on the undercarriage of the vehicle's cab. Previous corrective action to a similar event did not prevent recurrence. This is a repeat violation (50-266/97-007-03; 50-301/97007-03).

This is a Severity Level IV violation (Supplement III)."

Response to Violation 2

Reason for Violation

The violation occurred as a result of insufficient management oversight to ensure security officer performance is consistent and thorough in all assigned duties.

Corrective Actions Taken:

- As noted in the inspection report, when the deficiencies were brought to the attention of the involved security officer, the search was adequately completed. The security officer was counseled and received retraining in search techniques. In addition, the security force was briefed on the event.
- Routine security contractor management observation of vehicle searches was initiated. The standards and expectations for vehicle searching is reinforced through observation of this activity.
- As discussed in our reply of January 14, 1997, to the first vehicle search Notice of Violation, a joint effort between Wisconsin Electric, Schneider National, Inc., and the Wisconsin State Patrol was undertaken to provide security personnel with "hands-on" training in the searching of large, over-the-road vehicles. The first of two training sessions was completed in April, 1997.

Previous Corrective Actions:

Corrective action for the previous similar violation did not include management oversight of the daily search activities. Prior to this most recent violation, observations of routine daily search activities were not conducted and security personnel search activity performance was only measured through the results of search-specific drills. Since this violation was identified, fifteen management observations were performed in May, three of which identified deficient search techniques.

Corrective Actions to be Taken:

- A security officer job observation program will be developed and implemented by July 30, 1997. Our management observations of vehicle search activities will continue throughout the development of this new program.
- As indicated in our letter to you of May 12, 1997, we were unable to complete training of security personnel in over-the-road vehicle search techniques by our original commitment date of April 30, 1997. The second training session was canceled because of an unavoidable personal emergency that affected the instructor. The second training session is being held coincident with an ongoing NRC physical security inspection. Our revised corrective action completion date was extended to June 30, 1997, in order to ensure that the lessons learned from this training could be factored, as appropriate, into security procedures. That commitment remains unchanged.

Date Full Compliance was Achieved:

Full compliance with NRC requirements was achieved on April 3, 1997. The additional corrective actions being taken will enhance our vehicle search program.