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RULES & DIR. BRANCH  
US NRC

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July 26, 1999

Point Beach Nuclear Plant  
6610 Nuclear Rd.  
Two Rivers, WI 54241  
Phone 920 755-2321

(24)

NPL 20000-0005

January 7, 2000

Mr. David L. Meyer  
Chief, Rules and Directives Branch  
Division of Administrative Services  
Office of Administration, Mail Stop T6D59  
United States Nuclear Regulatory Commission  
Washington, DC 20555

Dear Mr. Meyer:

COMMENTS ON THE REACTOR OVERSIGHT PROCESS

Wisconsin Electric Power Company, owners and operators of Point Beach Nuclear Plant, would like to take this opportunity to comment on the revised Reactor Oversight Process. These comments are provided in response to a Federal Register Notice dated July 26, 1999.

In general, we are in support of the Reactor Oversight Process, the development of performance indicators and the related baseline inspection procedures.

We concur with the comments provided to the Nuclear Regulatory Commission (NRC) by the Shadow Plant Program participants (reference letter from G.T. Gibson to D.L. Meyer) and the Nuclear Energy Institute (reference letter from Steve Floyd to D. L. Meyer).

We offer the following specific comments, in addition to those noted in the above referenced letters:

- 1) We believe the current fourteen day requirement for submittal of quarterly performance indicator (PI) data to be overly restrictive. We are in favor of changing this requirement to 30 days following the end of a quarter. Fourteen days is not an adequate amount of time to collect the indicator data and conduct internal reviews and approvals of the data prior to providing them to the NRC. This problem can be exacerbated by differing schedules and time away from work, e.g., training, vacation, illness, for people involved in the data gathering, review and approval process. Thirty days will allow the time necessary for data collection and analysis, and data verification to ensure that the data are error-free.
- 2) We recommend that Risk Issues Matrices be prepared using the most recent plant probabilistic risk assessment (PRA) analyses. The NRC staff or its contractors are currently planning to use Individual Plant Evaluation (IPE) submittals that were made to NRC that are now a few years old. The IPE submittals do not contain the most current information for plant equipment and

conditions. Use of the IPE submittals will cause extra work to make comparisons to the most current plant PRA analyses and updated information will need to be provided to NRC.

- 3) The Security Equipment Performance Index performance indicator must be modified. The Green-White threshold for this indicator is overly conservative and is not based on historical performance. The threshold for this indicator, as calculated, would require an availability for individual security equipment which exceeds that required for the emergency diesel generators and other safety systems, even though the unavailability is fully compensated by the Security force. The White-Yellow threshold for this indicator is also inappropriate. We believe the Yellow band for the performance indicators is meant to represent a significant reduction in safety margin. Since unavailable security equipment is fully compensated by the Security force, a significant reduction in margin cannot occur.
- 4) Additionally, the Security Significance Determination Process (SDP) must be corrected. The security SDP flow chart and documentation lacks sufficient guidance to generate repeatable results, and overemphasizes situations in which there is no significant decrease in reactor safety, making it inconsistent with the other PI thresholds and SDP findings. The guidance for the security SDP should be improved for full implementation. The industry has proposed a revision to the Security SDP that provides a method for generating consistent outcomes and appropriately determining the safety significance consistent with the other cornerstones.
- 5) The thresholds for performance indicators and SDP results need to be consistent across the cornerstones. For the Action Matrix to work as envisioned, a White, Yellow or Red input needs to have the same meaning in terms of safety significance for all cornerstones. Currently, some of the possible outcomes in the Emergency Preparedness and Security cornerstones are not consistent with the outcomes in the reactor safety and Radiation Protection cornerstones.

We are encouraged by the continuing improvements to the Reactor Oversight Process as a result of the Pilot Plant Program and the process by which it is being implemented with stakeholder involvement. We appreciate this opportunity to provide our comments.

Sincerely,



A. J. Cayia  
Manager,  
Regulatory Services & Licensing

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cc: NRC Resident Inspector  
NRC Project Manager  
NRC Regional Administrator  
PSCW