

DCS MS-016

MAR 14 1983

Docket Nos. 50-266  
and 50-301

Mr. C. W. Fay  
Assistant Vice President  
Wisconsin Electric Power Company  
231 West Michigan Street  
Milwaukee, Wisconsin 53201

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Dear Mr. Fay:

The Commission has issued the enclosed Order confirming your commitments to implement those post-TMI related items set forth in NUREG-0737 for which the staff requested completion on or after July 1, 1981. This Order is based on commitments contained in your letters responding to the NRC's Generic Letters 82-05 and 82-10 dated March 17, 1982 and May 5, 1982, respectively.

The Order references your letters and, in its attachments, contains lists of the applicable NUREG-0737 items with your schedular commitments. As discussed in the Order, several of the items listed in Generic Letter 82-10 will be handled outside of this Order.

The Commission's intention when it issued NUREG-0737 was that items would be completed in accordance with the staff's recommended schedule. However, our evaluation of your proposed schedule exceptions concludes that the proposed delays are acceptable. Among other things, the Order requires implementation of these items in accordance with your proposed schedule.

Some of the items set forth in the attachment to the Order are subject to post implementation review and inspection. Our post implementation review and/or the development of Technical Specifications may identify alterations to your method of implementing and maintaining the requirements. Any identified alterations will be the subject of future correspondence.

A copy of this Order is being filed with the Office of the Federal Register for publication.

Sincerely,

Original signed by  
Robert A. Clark  
Robert A. Clark, Chief  
Operating Reactors Branch #3  
Division of Licensing

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PDR ADOCK 05000266  
P PDR

Enclosure:  
Order

cc w/enclosure:  
See next page

OFFICE	ORB#3:DL	ORB#3:DL	ORB#3:DL	ORAB	AD/OR:DL	OELD	D:DL
SURNAME	PMKreutzer	TColburn/pn	RAClark	g	GOLinas	S. BURNS	Eisenhut
DATE	1/30/82	11/30/82	11/30/82	3/14/82	3/17/82	2/14/82	3/16/82



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

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Docket No. 50-266/50-301

Docketing and Service Section  
Office of the Secretary of the Commission

SUBJECT: WISCONSIS ELECTRIC POWER COMPANY, Point Beach Nuclear Plant,  
Units 1 and 2

Two signed originals of the Federal Register Notice identified below are enclosed for your transmittal to the Office of the Federal Register for publication. Additional conformed copies (12 ) of the Notice are enclosed for your use.

- Notice of Receipt of Application for Construction Permit(s) and Operating License(s).
- Notice of Receipt of Partial Application for Construction Permit(s) and Facility License(s): Time for Submission of Views on Antitrust Matters.
- Notice of Availability of Applicant's Environmental Report.
- Notice of Proposed Issuance of Amendment to Facility Operating License.
- Notice of Receipt of Application for Facility License(s); Notice of Availability of Applicant's Environmental Report; and Notice of Consideration of Issuance of Facility License(s) and Notice of Opportunity for Hearing.
- Notice of Availability of NRC Draft/Final Environmental Statement.
- Notice of Limited Work Authorization.
- Notice of Availability of Safety Evaluation Report.
- Notice of Issuance of Construction Permit(s).
- Notice of Issuance of Facility Operating License(s) or Amendment(s).
- Other: ORDER (NUREG-0737)

Division of Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
As Stated

OFFICE	ORB#3:DL					
SURNAME	PMKreutzer/pm					
DATE	3/15/83					

Wisconsin Electric Power Company

cc:

Mr. Bruce Churchill, Esquire  
Shaw, Pittman, Potts and Trowbridge  
1800 M Street, N. W.  
Washington, D. C. 20036

USNRC Resident Inspectors Office  
6612 Nuclear Road  
Two Rivers, Wisconsin 54241

Mr. Glenn A. Reed, Manager  
Nuclear Operations  
Wisconsin Electric Power Company  
Point Beach Nuclear Plant  
6610 Nuclear Road  
Two Rivers, Wisconsin 54241

Mr. Gordon Blaha  
Town Chairman  
Town of Two Creeks  
Route 3  
Two Rivers, Wisconsin 54241

Ms. Kathleen M. Falk  
General Counsel  
Wisconsin's Environmental Decade  
114 N. Carroll Street  
Madison, Wisconsin 53703

U. S. Environmental Protection Agency  
Federal Activities Branch  
Region V Office  
ATTN: Regional Radiation  
Representative  
230 S. Dearborn Street  
Chicago, Illinois 60604

Chairman  
Public Service Commission of Wisconsin  
Hills Farms State Office Building  
Madison, Wisconsin 53702

Regional Administrator  
Nuclear Regulatory Commission, Region III  
Office of Executive Director for Operations  
799 Roosevelt Road  
Glen Ellyn, Illinois 60137



additional protection in the operation of nuclear facilities based on the experience from the accident at TMI-2 and the official studies and investigations of the accident. The staff's proposed requirements and schedule for implementation are set forth in NUREG-0737, "Clarification of TMI Action Plan Requirements." Among these requirements are a number of items, consisting of hardware modifications, administrative procedure implementation and specific information to be submitted by the licensee, scheduled to be completed on or after July 1, 1981. On March 17, 1982, a letter (Generic Letter 82-05) was sent to all licensees of operating power reactors for those items that were scheduled to be implemented from July 1, 1981 through March 1, 1982. Subsequently, on May 5, 1982, a letter (Generic Letter 82-10) was also sent to all licensees of operating power reactors for those items that were scheduled for implementation after March 1, 1982. These letters are hereby incorporated by reference. In these letters each licensee was requested to furnish within 30 days pursuant to 10 CFR 50.54(f) the following information for items which the staff had proposed for completion on or after July 1, 1981:

- (1) For applicable items that have been completed, confirmation of completion and the date of completion,
- (2) For items that have not been completed, a specific schedule for implementation, which the licensee committed to meet, and
- (3) Justification for delay, demonstration of need for the proposed schedule, and a description of the interim compensatory measures being taken.

III.

The licensee responded to Generic Letter 82-05 by letters dated April 26, July 20, and September 24, 1982. The licensee also responded to Generic Letter 82-10 by letter dated May 26, 1982. In these submittals, Wisconsin Electric Power Company confirmed that some of the items identified in the Generic Letters had been completed and made firm commitments to complete the remainder. The attached Tables summarizing the licensee's schedular commitments or status were developed by the staff from the Generic Letters and the licensee-provided information.

Generic Letters 82-05 and 82-10 addressed thirteen and sixteen items, respectively. Of the ten items listed in Generic Letter 82-10 requiring a response, six items are not included in this Order. Item I.A.1.3.2 is part of a separate rulemaking; Items I.C.1, III.A.1.2 (2 items), and III.A.2.2 will be handled separately following Commission actions that would proceed as a result of its consideration of Commission Paper SECY 82-111, as amended; for Items II.K.3.30 and II.K.3.31 (one item), the staff review of the generic models under II.K.3.30 has not been completed, and II.K.3.31 is not required until one year after staff approval of the generic models.

Eleven of the 17 items addressed in this Order are considered by the licensee to be completed or to require no modifications. The staff's evaluation of the licensee's delays for the remaining item is provided herein:

II.B.2 - Plant Shielding

The licensee has identified several areas which will require the use of permanent and portable shielding. These include shielding of the C-59 control panel and 1B32 and 2B32 motor control centers, wall penetrations in the Auxiliary Building and additional shielding for the control room doors and windows.

The licensee has cited several reasons for delays to date in implementing the plant shielding requirements. They include rejection of inadequate vendor proposals as late as March 1981 regarding C-59 control panel shielding, the incorrectly performed control room shielding analysis by the licensee's consultant (identified during the NRC staff's control room habitability review) and rejection of vendor proposals and design evaluations for moving the Unit 1 and shielding the Unit 2 safety injection lines. Further delays were encountered when, although preliminary studies indicated that the motor control centers were environmentally qualified, the original vendor's response in early 1982 indicated that shielding modifications were preferred to performance of a qualification analysis.

The licensee has installed the shielding for the wall penetration in the Auxiliary Building. Radiological design for the C-59 control panel and the two motor control centers has been completed and portable and permanent shielding recommendations

are under review by the licensee's plant staff. The work request for the structural design of the seismic, permanent shielding has been forwarded to the licensee's consultant. Portable shielding for the C-59 control panel and the control room windows and doors has been ordered.

While the licensee is working to complete all shielding modifications for Point Beach Nuclear Plant Units 1 and 2 by June 30, 1983, the licensee has committed to implementation by January 1, 1984. This is based on potential delays due to several areas of uncertainty. These include possible minor refinements to the portable shielding in order to be plant compatible, uncertainty in the response time for the structural consultant design of permanent shielding and unanticipated special construction delays related to the installation of permanent shielding.

The licensee reports that several interim compensatory measures have been implemented until shielding modifications can be completed. These include revision of plant emergency response procedures to specify necessary precautions prior to entry to the potential radiation problem areas. These procedures include strict radiation entry authorization, radiation surveying and monitoring, use of portable or temporary shielding and prior flushing of safety injection and residual heat removal lines to reduce background radiation.

The licensee states that none of the areas requiring the addition of permanent shielding require frequent or continuous personnel access. The motor control centers require access only for breaker maintenance. The C-59 control panel requires access only for operation of non-safety related auxiliary systems.

The licensee's analysis of portable shielding for the control room doors and windows indicate that shielding would not be required during a design basis loss of coolant accident (LOCA) or an accident involving partial melting of a few fuel assemblies. In the event of a major accident resulting in gross core damage and significant fission product release, control room operators will be instructed to avoid door and window openings.

II.F.1.3 - High-Range Containment Radiation Monitoring System

The licensee has experienced delays in the implementation of this system due to cabling and qualification problems identified in October of 1981, equipment delivery delays (auxiliary and Foxboro racks, replacement cabling) power supply bus upgrade design and construction delays and Auxiliary Safety Instrumentation Panel design and procurement delays. Recently identified isolation circuit modifications require installation during a unit's outage. The licensee plans to complete installation of this system by the end of June 1983.

II.F.1.4 - High-Range Containment Pressure

Pressure transmitters have been installed on Units 1 and 2 since the Unit 1 Fall 1981 refueling outage and the Unit 2 Spring 1982 refueling outage, respectively. The licensee reports that the delays in implementation are related to integrated cable pulling, delays in the delivery of Foxboro racks, delays in electrical power supply bus upgrade and Auxiliary Safety Instrumentation Panel design and procurement delays. The related protection system changes and control board modifications are outage dependent. The licensee plans to complete installation of this system by the end of June 1983.

II.F.1.5 - Containment Sump Water Level

Transmitters are installed in both units and cable pulling is complete in the Unit 2 containment. Unit 1 cable will be installed in the Fall 1982 refueling outage. Installation of transmitter signal receivers will follow the installation of adjacent vital bus distribution panels.

The licensee reports the major delays in installation to be due to problems with the architect-engineer design of the transmitter support and protection structure, delays in delivery of Foxboro

racks, delays in electrical bus upgrades and delays in Auxiliary Safety Instrumentation Panel design and procurement. The licensee expects installation of this system to be complete by the end of June 1983.

II.F.1.6 - Containment Hydrogen Monitoring System

The licensee reports delays in the implementation of this system due to delays in obtaining an acceptable architect-engineer design for Unit 1's detector support platform, delays in Exosensor equipment qualification and delivery, delivery delays of auxiliary and Foxboro racks, delays in electrical power supply bus upgrades and delays of Auxiliary Safety Instrumentation Panel design and procurement.

Detectors were not received until the middle of the Unit 2 Spring 1982 refueling outage. Installation could not take place because of fire detection work in progress in the Unit 2 containment. The detectors are scheduled for installation during the Unit 1 Fall 1982 and Unit 2 Spring 1983 refueling outages. The micro-processors are scheduled to be received during the Fall of 1982. The licensee plans to complete system installation by the end of June 1983.

III.D.3.4 - Control Room Habitability

By letter dated August 10, 1982, the NRC staff transmitted its evaluation of the licensee's proposals to provide acceptable control room habitability in accordance with the criteria in Section III.D.3.4 of NUREG-0737. The NRC staff approved the licensee's proposed modifications including installation of control room door and window portable shielding, installation of control room air supply line radioactive gas detection equipment, and obtaining additional self-contained breathing apparatus.

The licensee plans to complete modifications by January 1, 1983 with the exception of portable shielding which will be installed as scheduled in Item II.B.2 above.

We find, based on the above evaluation, that 1) the licensee has taken corrective actions regarding the delays and has made a responsible effort to implement the NUREG-0737 requirements noted; 2) there is good cause for the several delays; and 3) as noted above, interim compensatory measures have been provided.

In view of the foregoing, I have determined that these modifications and actions are required in the interest of public health and safety and should, therefore, be confirmed by Order.

IV.-

Accordingly, pursuant to Sections 103, 161i, and 161o of the Atomic Energy Act of 1954, as amended, and the Commission's regulations in 10 CFR Parts 2 and 50, IT IS HEREBY ORDERED EFFECTIVE IMMEDIATELY THAT THE LICENSEE SHALL:

Implement and maintain the specific items described as complete in the attachments to this Order. Incomplete items shall be completed by no later than the dates shown in the attachments (as described in the licensee's submittals noted in Section III herein) and maintained thereafter.

V.

The licensee may request a hearing on this Order within 20 days of the date of publication of this Order in the Federal Register. A request for a hearing shall be addressed to the Director, Office of Nuclear Reactor Regulation, U. S. Nuclear Regulatory Commission, Washington, D. C. 20555. A copy shall also be sent to the Executive Legal Director at the same address. A REQUEST FOR HEARING SHALL NOT STAY THE IMMEDIATE EFFECTIVENESS OF THIS ORDER.

If a hearing is requested by the licensee, the Commission will issue an Order designating the time and place of any such hearing.

If a hearing is held concerning this Order, the issue to be considered at the hearing shall be whether the licensee should comply with the requirements set forth in Section IV of this Order.

This Order is effective upon issuance.

FOR THE NUCLEAR REGULATORY COMMISSION



Robert A. Purple, Deputy Director.  
Division of Licensing  
Office of Nuclear Reactor Regulation

Dated at Bethesda, Maryland  
this 14th day of March,  
1983.

Attachments:

1. Licensee's Commitments on Applicable  
NUREG-0737 Requirements from Generic  
Letter 82-05
2. Licensee's Commitments on Applicable  
NUREG-0737 Requirements from Generic  
Letter 82-10

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS  
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
I.A.3.1	Simulator Exams	10/1/81	Include simulator exams in licensing examinations.	Complete
II.B.2	Plant Shielding	1/1/82	Modify facility to provide access to vital areas under accident conditions.	1/1/84
II.B.3	Post-accident sampling	1/1/82	Install upgrade post-accident sampling capability.	Complete
II.B.4	Training for Mitigating Core Damage	10/1/81	Complete training program.	Complete
II.E.1.2	Aux FW Indication & Flow Indicator	7/1/81	Modify instrumentation to level of safety grade.	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 5 - lower containment pressure setpoint to level compatible with normal operation.	Complete
II.E.4.2	Containment Isolation Dependability	7/1/81	Part 7 - isolate purge and vent valves on radiation signal.	Complete

\*Where complete date refers to a refueling outage, (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

LICENSEE COMMITMENTS ON APPLICABLE NUREG-0737 ITEMS  
FROM GENERIC LETTER 82-05

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)*
I.F.1	Accident Monitoring	1/1/82	(1) Install noble gas effluent monitors.	Complete
		1/1/82	(2) Provide capability for effluent monitoring of iodine.	Complete
		1/1/82	(3) Install in-containment radiation-level monitor.	6/30/83
		1/1/82.	(4) Provide continuous indication of containment pressure.	6/30/83
		1/1/82	(5) Provide continuous indication of containment water level.	6/30/83
		1/1/82	(6) Provide continuous indication of hydrogen concentration in containment.	6/30/83

Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

ITEM	TITLE	NUREG-0737 SCHEDULE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS) *
I.A.1.3.1	Limit Overtime	10/1/82 per Gen. Ltr. 82-12 dtd. 6/15/82	Revise administrative procedures to limit overtime in accordance w/NRC Policy Statement issued by Gen. Ltr. No. 82-12, dtd. June 15, 1982.	Complete
I.A.1.3.2	**Minimum Shift Crew	To be superseded by Proposed Rule.	To be addressed in the Final Rule on Licensed Operator Staffing at Nuclear Power Units.	To be addressed when Final Rule is issued.
I.C.1	**Revise Emergency Procedures	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability.	To be determined
II.D.1.2	RV and SV Test Programs	7/1/82	Submit plant-specific report on relief and safety valve program	Complete.
II.D.1.3	Block Valve Test Program	7/1/82	Submit report on results of test program	Complete.
II.K.3.30 & 31	**SBLOCA Analysis	1 yr. after staff approval of model	Submit plant specific analyses.	To be determined following staff approval of model
III.A.1.2	**Staffing Levels for Emergency Situations	Superseded by SECY 82-111	Reference SECY 82-111, Requirements for Emergency Response Capability	To be determined
III.A.1.2	**Upgrade Emergency Support Facilities	"" ""	"" ""	"" ""
III.A.2.2	**Meteorological Data	"" ""	"" ""	"" ""
III.D.3.4	Control Room Habitability	To be determined by licensee	Modify facility as identified by licensee study	1/1/84

\*Where completion date refers to a refueling outage (the estimated date when the outage begins), the item will be completed prior to the restart of the facility.

\*\*Not Part of Confirmatory Order



UNITED STATES  
NUCLEAR REGULATORY COMMISSION  
WASHINGTON, D.C. 20555

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Docket No. 50-266/50-301

Docketing and Service Section  
Office of the Secretary of the Commission

SUBJECT: WISCONSIS ELECTRIC POWER COMPANY, Point Beach Nuclear Plant,  
Units 1 and 2

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- Other: ORDER (NUREG-0737)

Division of Licensing  
Office of Nuclear Reactor Regulation

Enclosure:  
As Stated

OFFICE →	ORB#3 DL					
SURNAME →	PMKreutzer/pm					
DATE →	3/15/83					