

June 8, 2005

CAL 3-04-001

Mr. Dennis L. Koehl  
Site Vice-President  
Point Beach Nuclear Plant  
Nuclear Management Company, LLC  
6590 Nuclear Road  
Two Rivers, WI 54241-9516

SUBJECT: UPDATE ON CONFIRMATORY ACTION LETTER COMMITMENTS AND  
PERFORMANCE MEASURES, LETTER DATED MARCH 31, 2005

Dear Mr. Koehl:

In the subject letter, dated March 31, 2005, you provided an update of your previous commitments documented in Confirmatory Action Letter (CAL) 3-04-001, issued April 21, 2004. As discussed below, this letter provides our understanding of the update. At this time, we have no questions on any item in the update, but make no assessment of the items meeting the CAL.

Action Plan OR-01-004, Step 35: Publish Department Excellence Plans: Although not explicitly stated, the discussion in your letter for this item implies that while the step was completed as committed by the publishing of the department excellence plans, these plans as such will not be maintained as "living documents." Instead, department performance improvement efforts will continue to be controlled by the site Excellence Plan, which will be maintained as a "living document." We have no questions at this time regarding this step and may review it during future inspections.

Action Plan OR-08-017, Performance Measure of Operations Procedure Feedback Backlog is Less than 450: This measure was listed in your letter, dated March 22, 2004, that was incorporated in the CAL. From the discussion in your March 31, 2005, letter on this item, we have concluded that since this measure was committed to, your operations procedure feedback process has been significantly changed such that the measure is no longer of value in gauging the improvement efforts of the engineering/operations interface as it relates to operations procedure quality. Also, the previously unanticipated large scope of the calculation project may affect your effort to meet the original measure. We noted that you did not propose a replacement measure in your March 31, 2005, letter. We have no questions at this time regarding this performance measure. We may review your activities in this area during future inspections.

Action Plan OP-09-004, Upgrade and Implement Emergency Preparedness Emergency Action Levels (EALs): In your March 22, 2004, letter, you estimated a completion date of the 2<sup>nd</sup> quarter of 2005, with implementation of the upgraded EALs within 90 days of approval of the EALs by the NRC. Your March 31, 2005, letter reaffirmed your commitment to implement the revised EALs within 90 days of NRC approval, but noted

that this approval may not occur until around the end of the 2<sup>nd</sup> quarter of 2005. We will review your implementation of the approved, revised EALs during a future inspection.

Action Plan OP-10-004, The Performance Indicator for Corrective Action Implementation Effectiveness would be Greater than 80 Percent, with a Completion Date of the 1<sup>st</sup> Quarter of 2005: This measure was listed in your letter, dated March 22, 2004, that was incorporated in the CAL. Your March 31, 2005, letter noted that the indicator had been met in the second half of 2004, but was not met in the 1<sup>st</sup> quarter of 2005. Your letter further stated that this failure to meet the performance measure was entered in the corrective action program for evaluation and possible corrective action. We have no questions at this time regarding this performance measure and will review it during future inspections.

Action Plan OP-14-005, Validate and Integrate Calculations and Setpoints: As committed by you in your November 23, 2004, letter, your March 31, 2005, letter provides a schedule for completion of this action plan. This schedule reflects the increased scope and complexity of the calculation and setpoint project. At this time, we have no questions regarding this schedule. In addition, your March 31, 2005, letter discusses your changes to commitment action steps 2.D, 2.E, and 10 of Action Plan OP-14-005. We have no questions at this time regarding these changes; however, we will discuss with you during future management meetings mechanisms that we would like to establish regarding long term tracking of the completion of this project.

Action Plan EQ-15-011, Bolted Fault Calculation Project: Your letter discusses the basis for changing your previous commitment completion date for the calculation portion (step 5 of the Action Plan) of the project to the 3<sup>rd</sup> quarter of 2005. We have no questions at this time on this change and will review your implementation of it during future inspections.

Action Plan EQ-15-012, Step 9, Monitor Effectiveness of Installed Modification to Dewater Manholes Containing Safety-Related Electrical Cables: You stated that your review determined the modification was not fully effective in resolving the manhole flooding issue and that a corrective action program document had been written to perform additional corrective actions. However, you have not provided an expected completion date for this item. During a future CAL followup inspection, we would like to review your additional corrective actions that you have taken to ensure sustainability in addressing the original concern.

To complete our review of these items and other items from the CAL, we have scheduled several inspections. Two of these inspections were listed in the schedule attached to the Annual Assessment Letter, dated March 2, 2005. This schedule included an engineering team inspection in late July to August to review engineering items from the CAL and an expanded problem identification and resolution inspection in September to review corrective action program items from the CAL. We also will be conducting two inspections in June that are not listed in that schedule: an inspector from our emergency preparedness group will conduct an inspection to review emergency preparedness items from the CAL and two inspectors will

conduct an inspection to review human performance and engineering items from the CAL. The scope and schedule of these two inspections have previously been discussed with members of your staff

If you have any questions or clarifying information regarding our understanding of your March 31, 2005, letter updating the CAL or if you have any questions regarding our planned inspection and meeting activities for the remainder of 2005, as discussed above, please contact me at (630) 829-9627.

Sincerely,

**/RA/**

Patrick L. Loudon, Chief  
Branch 5  
Division of Reactor Projects

Docket Nos. 50-266; 50-301  
License Nos. DPR-24; DPR-27

cc: F. Kuester, President and Chief  
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