



Wisconsin Electric POWER COMPANY
231 WEST MICHIGAN, MILWAUKEE, WISCONSIN 53201

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August 13, 1979

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:

DEDICATED TELEPHONES
POINT BEACH NUCLEAR PLANT
DOCKETS 50-266 and 50-301

As you know, dedicated telephone lines were installed at Point Beach Nuclear Plant in response to your May 22, 1979 letter which justified the need for such communications facilities to "facilitate the initial notification and to assure continuing communications" in the event of a nuclear incident. Your June 22 letter provided details of the testing procedures to be used for this "OPX network" which were initially to be on a daily basis, but to be on a reduced frequency once the reliability of the network was established. This letter emphasized that the OPX network was not to be used for routine communications with the Nuclear Regulatory Commission, but only for events requiring immediate notification.

On July 23 we received your letter dated July 19 informing us that the NRC was commencing, effective that day, to make a daily telephone contact with Point Beach Nuclear Plant to obtain an operating status report on the plant, as well as to provide a daily telephone check. We believe that the use of this dedicated telephone communications system in this fashion is inappropriate and undesirable.

First, the need for such communications facilities, as indicated in your May 22 advice, was to facilitate the initial notification and to assure continuing communications in the event of an accident. It seems to us that an appropriate testing of such a system would require that our plant call the NRC, and not the other way around. To our knowledge, there has been no test to determine whether nuclear plant initiation of such a call is successful. For such demonstration, we believe the phrase, "Don't call us, we'll call you" is appropriate.

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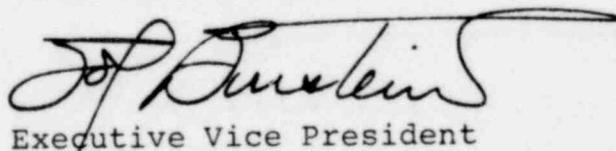
Secondly, if it is the desire to have the dedicated telephone lines answered promptly whenever a call is placed by the NRC, that call, of necessity, will distract the plant staff requiring their prompt response from whatever activities are ongoing at the moment. The calls may, and, indeed, on occasion have, come at inopportune times.

Thirdly, as you know, Point Beach Unit 1 is currently shut down for inspection and plugging of steam generator tubes. Our experience has been that these daily telephone checks have prompted discussions by NRC personnel concerning plant technical problems not only as to the operating status of the plant, but also details as to the reasons for such status and the progress of inspection and schedules for return to service. Such discussions, we believe, are inappropriate for this means of communications, and certainly will lead to inaccurate transmittal of information by the NRC staff not familiar with the facility or its operating history.

Fourthly, we believe we have demonstrated that prompt and full communications presently exist between your office, Point Beach Nuclear Plant, and our corporate headquarters. We believe further that we have demonstrated that continued good communications concerning plant activities with your assigned Inspector produce a more meaningful understanding and appreciation of plant status than the proposed daily request for such a status check by means of the dedicated telephone system.

We should, of course, be pleased to discuss the matter with you at your convenience. Pending other specific criteria limiting the use of this telephone system in non-emergency situations, we have, however, instructed our plant operating personnel to limit their response to plant status questions by simply stating that the unit(s) are not operating at power and referring the caller to normal communications channels for further details.

Very truly yours,



Executive Vice President

Sol Burschein

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