



UNITED STATES
NUCLEAR REGULATORY COMMISSION
REGION III
799 ROOSEVELT ROAD
GLEN ELLYN, ILLINOIS 60137

Attachment 2

June 1, 1982

SD-266
SD-301

MEMORANDUM FOR: Harold R. Denton, Director of the Office
of Nuclear Reactor Regulation

FROM: James G. Keppler, Regional Administrator

SUBJECT: MINIMUM STAFFING LEVELS FOR EMERGENCY SITUATIONS AT THE
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Enclosed is WEPCOs May 19, 1982, letter responding to the May 6, 1982, management enforcement meeting in which Region III expressed its concerns regarding minimum shift staffing at Point Beach Nuclear Plant. Since the issues regarding Senior Reactor Operators and Auxiliary Operators are under your responsibility, we are submitting this for your review and comments so we may take appropriate action.

We agree with the licensee's position regarding the second Senior Reactor Operator onshift and that a qualified security person may act as communicator/notifier until appropriately relieved by augmentation personnel.

We disagree with the licensee's position regarding no need for an auxiliary operator (AO) to secure operations on the "unaffected" unit. We feel that an accident on one unit can affect safe shutdown assessment or operations of the unaffected unit at Pt. Beach due to the several cross-ties and common components/elements at this facility. Further, a severe accident on one unit may require the unaffected unit AO to assist in auxiliary operations of the affected unit. It has been a common staff position that accident situations could arise requiring more onshift expertise than so indicated in Table B-i. This table reflects only the minimum requirements, and additional expertise ("hands") could be needed to implement a particular task.

Further, we disagree with the licensee's position regarding having the Rad/Chem Technician only available onsite 88 hours out of 168 hours. In an accident occur during a time unattended by a Rad/Chem Technician, they would not be able to conduct any post-accident sample within one hour of the accident. Guidance for this function indicates full time coverage is required. During the meeting, post-accident sampling and analysis of all potential source terms were discussed, i.e., primary coolant, containment atmosphere and station effluents. The licensee provided no technical basis for not needing a Rad/Chem Technician onshift. However, they committed to have this expertise onshift within thirty minutes after declaration of an emergency.

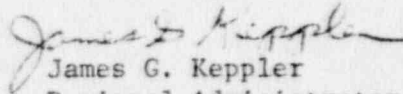
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It should be noted that Pt. Beach sent your office a letter dated May 19, 1982, (copy enclosed), which apparently indicates an adequate staff of operations personnel. However, the licensee committed one of these personnel (AO) to in-plant health physics operations and therefore he cannot be considered available for operations accident assessment.

These matters were discussed with Mr. Robert A. Purple, Deputy Director, Division of Licensing on May 7, 1982, by W. L. Axelson of my staff. It is our intention to issue a Show Cause or other appropriate Order pursuant to 10CFR 50.47(b)(2) unless you have any serious disagreement with our position.


James G. Keppler
Regional Administrator

Enclosures: (2)

cc: R. Purple, DOL/NRR
R. DeYoung, OIE
B. Grimes, OIE