



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

POOR ORIGINAL

September 10, 1980

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:

DOCKET NOS. 50-266 AND 50-301
REPLY TO IE INSPECTION REPORT
NOS. 50-266/80-12 AND 50-301/80-12
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

Mr. R. F. Heishman's letter of August 22, 1980, which transmitted the subject inspection reports, included a notice of an infraction item. This notice stated that, contrary to Point Beach Nuclear Plant Technical Specification Item 15.6.8.1, certain plant activities observed on July 1 and 2, 1980 were not conducted in accordance with approved radiological control procedures as promulgated in the Point Beach Nuclear Plant Health Physics Administrative Control Policies and Procedures Manual. Pursuant to Section 2.201 of the Commission's regulations, we are providing the following response to the Notice of Violation.

Point Beach Health Physics Procedure HP 2.1, Section 2.4, states that "normal entry to and exit from the controlled zone shall be through the two designated access control points only". The activities described in item (a) of the Notice of Violation was not a "normal entry" in that the maintenance worker did not go anywhere within the controlled zone of the plant, but rather worked briefly just inside the boundary. Furthermore, he worked in a prudent manner (wearing shoe covers), picked up scrap metal already declared clean for release by the Health Physics Group, and loaded it into a truck across the controlled zone boundary. This is not the method we would prefer to see for most controlled zone work activities, but it does not violate the intent of the procedure which governs controlled zone entry normally associated with extensive work activities well within the boundaries of the controlled zone area.

Point Beach Health Physics Procedure HP 2.5, Section 1.0, states "the requirements '(clothing)' may be increased or decreased depending on contamination and airborne radioactivity conditions and the nature of the work to be performed". Other statements in this section also discuss allowances for clothing variation dependent upon required duties and plant condition.

In order to emphasize the importance of radiological boundaries, HPIS 80-04, "Control of Radiological Boundaries", was issued to all plant personnel. To eliminate any future confusion in release of materials from the controlled side, a laydown area has been painted on the asphalt which designates an area for materials being cleared for release to the clean side. A painted boundary was also added to the existing boundary cable to better define the controlled zone area.

The second item mentioned in the inspection report regarded the presence in the turbine building of a sludge tank used to accumulate sludge from the lancing of the feedwater heaters. This tank had a radioactive material sticker attached and was located in the Unit 2 turbine hall "clean" area. The use of this "catch basin" tank was a prudent, good practice measure to keep solids (potentially slightly radioactive) out of the turbine floor drains leading to the plant holding pond.

Point Beach Health Physics Procedure HP 2.4, Section 4.0, states "all items shall be tagged with a properly executed radioactive material tag and either packaged and sealed to prevent the release of contamination, or used only as specified by a Health Physics Supervisor". This tank is neither a storage container nor a shipping container. It is a process tank and as such is exempt from labeling requirements per 10 CFR 20.203(f)(3)(vii). The radioactive material tag on the tank was perhaps incorrectly used as a precautionary method to refer any use of the tank back to control by Health Physics. No external hazard was posted nor existed from this tank and no contamination has resulted from its use or storage. The tank had no hazard that was not labeled. It resulted in the release of no contamination and it was used only as originally approved by Health Physics. Therefore, we feel no violation of Health Physics Procedure HP 2.5, Section 4.0, occurred.

As a result of this concern on the part of the Resident Inspector, the tank was internally surveyed and the radioactive material sticker was removed. A tag was applied to the tank describing its contents. All openings to atmosphere were taped closed on the tank. An additional sign was also applied to the tank reading "do not use or remove this tank without notifying Health Physics".

Mr. J. G. Keppler

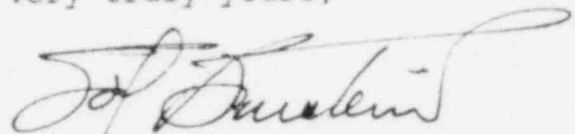
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It is believed that the described actions will avoid further concerns of this type. These actions were fully implemented as of September 5, 1980.

In our evaluation of the events, we have concluded that neither event constitutes a noncompliance with NRC regulations. The items were within the scope of the noted procedures or policies which we believe to be prudent and in full compliance with regulatory requirements. The actions taken constituted clarification of those policies and do not represent a change to our health physics practices.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Sol Burstein".

Executive Vice President

Sol Burstein

Copy to NRC Resident Inspector
Point Beach Nuclear Plant