



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

May 8, 1981

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:

REPLY TO NRC IE INSPECTION REPORT  
NOS. 50-266/81-08 AND 50-301/81-07  
POINT BEACH NUCLEAR PLANT

Your letter dated April 14, 1981, which we received on April 20, 1981, forwarded IE Inspection Reports 50-266/81-08 and 50-301/81-07. This letter included a Notice of Violation which was enclosed as Appendix "A". Appendix "A" described a Severity Level VI violation consisting of "eleven (11) instruments whose calibration was left outside the test acceptance criteria contained in the procedures without documentation of review and evaluation of these conditions by supervisory personnel as required by the procedures."

The Point Beach procedure issued and approved in conformance with 10 CFR 50 Appendix B and Technical Specification 15.6.8.1 requires that "All calibration records shall be reviewed and approved by the Instrument & Control Engineer or a person designated by him." In the calibration records mentioned in the inspection reports, this review and approval was completed in all cases. Nine of the eleven instrument calibrations had been reviewed and approved by the I&C Engineer. The remaining two reviews had been performed by his designee as allowed by the procedure. Thus, contrary to the Notice of Violation, the proper review was conducted.

The Notice of Violation also states that the documentation was not performed in accordance with the procedures. The applicable procedures do not require a documented review of out-of-specification data but do provide for a review to allow for statements of problems and action taken. This review is indicated by the signature of the I&C Engineer or his designee on each data sheet for each component. This review includes identifying those out-of-specification values and assessing the significance with respect to the intended purpose of the instruments involved.

Mr. J. G. Keppler

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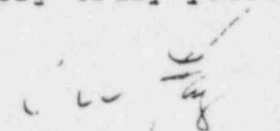
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The instruments involved in this Notice of Violation had adequate proof of operability and accuracy. This was verified by means of the review process described.

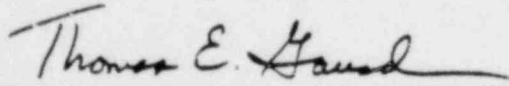
The documentation of these reviews by the I&C Engineer was not indicated on the procedure form but was signed off on the data sheets as required. The I&C Engineer was cognizant of the out-of-specification data points and had concurred with the continued operation and use of the instruments for their intended function. This procedural problem has been eliminated by the issuance on April 10, 1981 of two new procedures in which out-of-tolerance values are encircled in red and the review of the out-of-tolerance value is specifically addressed in writing by the I&C Engineer. We considered this to be appropriate corrective action.

One point of administrative deficiency identified in this inspection report was that some instruments calibrated by the I&C group may be used by other groups for special purposes such as calorimetric calculations and special tests. These special-purpose instruments are being identified by plant groups who use the instruments so that when out-of-tolerance values are discovered, this information will be reported to the appropriate group for further evaluation. These actions are specified in Point Beach procedure PBNP 6.1.2.b dated April 10, 1981.

Very truly yours,

  
C. W. Fay, Director  
Nuclear Power Department

Subscribed and sworn to before me  
This 8th day of May, 1981.

  
Notary Public, State of Wisconsin  
My Commission ~~expires~~ is permanent.

Copy to: NRC Resident Inspector