



Wisconsin Electric POWER COMPANY
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April 14, 1981

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. Darrell G. Eisenhut, Director
Division of Licensing

Gentlemen:



DOCKET NOS. 50-266 AND 50-301
POST-TMI REQUIREMENTS FOR THE
EMERGENCY OPERATIONS FACILITY
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

Your generic letter 81-10 dated February 18, 1981, discussed the post TMI requirements for the Emergency Operation Facility (EOF) and provided clarification regarding location and habitability of the EOF and staffing levels for emergency situations. Further guidance concerning the emergency response facilities (ERFs) including the EOF was subsequently issued with the final revision of NUREG-0696 which was forwarded to all licensees with your generic letter number 17 dated March 5, 1981.

In your February 18, 1981 letter, you requested all licensees to furnish confirmation that the implementation dates indicated in Enclosure 1 to the letter would be met. Enclosure 1 addressed both implementation dates for staffing requirements and schedule dates for the conceptual design and operability of the emergency response facilities. This letter contains our comments regarding both the emergency response facilities implementation and staffing requirement commitments.

Your schedule for upgraded emergency response facilities requests submittal of conceptual design information by June 1, 1981, and an operational date for the upgraded facilities of October 1, 1982. Our discussion of these schedule dates is divided into two areas, the first concerning instrumentation and data display systems and the second concerning the buildings and physical structures.

By June 1, 1981, Wisconsin Electric will provide a description of the instrumentation systems it plans to install to meet the requirements of NUREG-0696. Where a requirement is not met, an alternative solution or plan will be provided or a reason given as to why the requirement need not be met.

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The design of the instrumentation systems will still be in progress as of June 1, so the description provided may not be complete. It is expected that the design will be completed by September 1 and the final system description will be provided at that time.

It is further expected that the instrumentation and data display systems will not be completely operational by October 1, 1982, due to considerations involving delivery, installation, and set-up of equipment. We are already in the process of ordering this equipment. Our June 1 submittal will provide an update on the expected schedule, but our present estimate is that the system will not be fully operational until April, 1983. This long schedule is due to the complete change-out of the existing plant process computer system necessary to meet NUREG-0696 requirements. As an interim measure, we will be moving our temporary instrumentation system to our Technical Support Center (TSC) building when it is completed in late summer 1981. This system contains the key safety parameters and should be sufficient until the final system is completely operational.

We will also provide, by June 1, 1981, a written description of the conceptual design for the physical structures and buildings associated with our emergency response facilities. However, we have some disagreement with your latest criteria for these facilities, particularly those requirements for the EOF. In a letter to the Secretary of the Commission dated February 18, 1981, we summarized our previous oral and written comments on the EOF requirements and again requested consideration of those comments. By letter dated March 16, 1981, Mr. Stello acknowledged receipt of our comments and indicated that our proposed ERFs would meet the criteria of NUREG-0696 with some revisions in data distribution and function. However, no formal review of our proposals as a potential alternate means of meeting the requirements was made.

It is therefore our intention to submit by June 1, 1981, a description of our conceptual design for ERFs at Point Beach Nuclear Plant for your formal review as an alternate means for meeting the requirements. Our presentation will express the basic issues discussed in our letter of February 18, 1981. Essential to our position is the generous size of our TSC (18,000 ft.²), which can easily accommodate the additional personnel and functions associated with meteorology, offsite dose assessment, and decisionmaking. Accordingly, these functions and associated data display are not necessary at the EOF, and habitability provisions are not required.

As explained in our February 18, 1981 letter, the changing criteria for the EOF had forced us to suspend implementation of our plans for the EOF. Although the criteria have now been more firmly established by NRC, Enclosure 1 to your February 18, 1981 letter states that a preimplementation review of conceptual design submittals will be performed by NRC. Accordingly, we will not resume final design or initiate construction of the EOF building until this review is completed. Hence, the October 1982 operational date for the EOF portion of the upgraded emergency

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response facilities is probably not achievable. Plans for the TSC cannot be changed since that facility is already well under construction. Except for the instrumentation and display system concerns expressed above, the TSC should be operational prior to the October 1982 date.

Your letter of February 18, 1981 also enclosed Table III.A.1.2-1 concerning staffing requirements. The following discussion is to inform you how Wisconsin Electric intends to meet the intent of those requirements.

Our letter of November 3, 1980 to you, in response to your letter of July 31, 1980 on interim staffing, describes the shift composition at Point Beach Nuclear Plant and specifically pointed out our belief that a determination of staffing requirements should give recognition to specific plant design and arrangement. We further invited your attention to portions of NUREG/CR-1656 which we believe support our position and we discussed steps which had been taken at Wisconsin Electric to enhance personnel capabilities after TMI. We also pointed out numerous problems facing the industry at this time in obtaining additional properly qualified and motivated personnel.

While our November 3 letter did include a plan for providing eight persons per shift as of July 1982, we stated that such staffing was not considered to be necessary and solicited your review of the staffing requirements at Point Beach. Although the seven-man shift and other duty and call arrangements discussed below have proven to be completely adequate for safe plant operation for over ten years, including providing proper response to accident situations, we recognize that recent NRC actions related to personnel qualifications and training do increase the work load of shift personnel. Therefore, in spite of the fact that there has been no specific reply to our November 3 letter, it is apparent that ever-increasing NRC requirements do, indeed, make it necessary to add shift personnel. We, therefore, intend to proceed as outlined in the development schedule attached to our November 3 letter to achieve a shift complement of eight by July 1982.

We are further considering the desirability of providing radio-chemistry technicians on one additional shift. Our decision on this matter depends upon our determination that such additional personnel can be appropriately and productively occupied on a day-to-day basis. With or without such additional people, we believe that we can adequately perform all necessary functions during routine operation or in the event of an accident by the shift personnel giving consideration to the following:

1. A duty and call technical advisor (STA) is within ten minutes of the control room at all times. This person has had special training in the analyses of plant abnormalities.
2. A duty and call superintendent is available to consult and provide advice to the shift supervisor at all times. This system has been used at Point Beach for over ten years and involves a senior member of the staff being provided with communications equipment so that

he can be in contact with the control room on short notice at anytime. This arrangement has been tested many times over the years and its value and effectiveness is well established.

3. Point Beach Nuclear Plant is located in a rural area in Wisconsin and most employees live within 30 minutes of the plant. Essentially all employees live within 60 minutes. We have had occasions over the years to call in maintenance personnel, health physics personnel, chemistry or instrument technicians, and others during "off hours". We have always been successful in obtaining necessary personnel.
4. All auxiliary operators at Point Beach are trained and qualified to perform health physics duties.
5. We have chemistry supervisors on call who are capable of doing sampling analyses. NUREG-0737 recognizes that it is not advisable to take samples without due care and that results are not required for three hours after sampling.

Further, it must be recognized that to require personnel in excess of those required to properly operate a plant will result in demotivation of personnel and in excessive turnover. Technically competent individuals are not being properly inspired by being idle or performing "make work" activities. Now, more than ever, the nation cannot afford such waste. The staff at Point Beach has proven its ability to safely operate the plant for over a decade. We are planning to add one additional licensed person per shift in recognition of the increasing work load on shift personnel since TMI. To provide further on-shift staff at Point Beach is neither warranted nor wise.

We believe that the "duty and call" system and the "on call" system utilized at Point Beach in conjunction with the proximity of personnel to the plant meets the intent of the emergency staffing requirements. We do, however, have some additional difficulty regarding Table III.A.1.2-1 as follows:

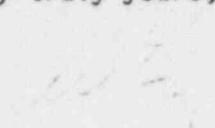
1. The need for an additional "communicator" within 30 minutes and two more within 60 minutes is unnecessary at the Point Beach location. Our emergency planning calls for communications with only four centers: the NRC, the State of Wisconsin, Manitowoc County, and Kewaunee County. In no way would these communications be required to be continuous, except for the NRC, during the early portions of an accident when the extent and effects of the situation are undergoing evaluation. Additional communicators will be available in accordance with our emergency plans for manning the Technical Support Center and Emergency Operations Facility.

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2. The listing for additions to be made within 30 minutes is apparently in error since the total is stated to be 11 while the numbers add up to 12. This may be due to three individuals being indicated for two positions (electrical maintenance/instrument and control technician).
3. For Point Beach, with the exception of utilizing "call in" for some of those that Table III.A.1.2-1 indicates as "on shift" (as discussed above), we consider that 60 minutes is a more appropriate time frame. It must be recognized and emphasized that working on shift or being "on call" is not an attractive feature of employment and is part of the reason for difficulties in staffing nuclear plants. Some flexibility in this regard must be allowed and the numbers and types of people on call must be held to a reasonable minimum.
4. Our emergency plan provides for manning of the Emergency Operations Facility within two hours rather than 60 minutes. This is considered to be completely adequate, particularly since Table III.A.1.2-1 acknowledges that "minute-to-minute facility operations remains with senior manager in technical support center or control room".

In summary, we consider that the staffing which we have outlined in this letter is a practical and adequate program to operate Point Beach Nuclear Plant during both routine and emergency conditions. We would be pleased to discuss this matter or our comments regarding ERFs further if you wish. If you do not concur with our conclusions, please advise us of your specific concerns as related to the Point Beach Nuclear Plant in order that appropriate further action can be taken in a timely manner.

Very truly yours,


C. W. Fay, Director
Nuclear Power Department

Copy to: NRC Resident Inspector