



Wisconsin Electric
POWER COMPANY

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VPNPD-93-125
NRC-93-082

July 1, 1993

Mr. Thomas Martin, Regional Administrator
Region III
U.S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Martin:

DOCKETS 50-266 AND 50-301
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE (SALP) REPORT
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

We would like to thank you for the candid dialogue that we had with members of your staff on June 17, 1993, at the public meeting regarding our SALP 10 report, for the assessment period February 1, 1992, through March 31, 1993. The SALP report, presentations, and discussions provided us with valuable insights as to our performance. We appreciate your staff's positive comments on those programs and initiatives that, based on your evaluations, are working. We also appreciate the feedback on our programs and initiatives that require continued work and/or those that are too new for you to effectively evaluate.

In the initial SALP 10 report, dated May 28, 1993, we have identified several areas which we believe require minor clarification. In the safety assessment/quality verification functional area, the report contains the wording "the SEG offsite and onsite review committees..." After discussing this statement with members of your staff, we believe the statement actually addresses three distinct entities. These three entities are our Safety Evaluation Group (SEG), our Offsite Review Committee (ORSC), and the onsite review committee or our Manager's Supervisory Staff (MSS).

In the "Summary of Results" section of the SALP report, there was what we believed to be an inconsistency in the evaluation of our performance in the maintenance/surveillance functional area. In the opening paragraph, the report identifies the performance in this functional area as remaining "consistent with the previous assessment period," while in the paragraph specifically summarizing the maintenance/surveillance area, the report identifies an "improving trend." We discussed this perceived difference with

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members of your staff and understand that the first statement is intended to be a summary of the overall level of performance in this functional area, which remained consistent between the two SALP periods with a rating of 2. The identified trend provides an indication that the activities in this functional area are improving but continue to be within the criteria for an overall performance rating of 2.

Our final comments focus on the rating received in the security functional area. Based on our internal assessments and the discussion contained in the SALP 10 report, we believe that the SALP 2 rating is not completely reflective of our performance in the security area at PBNP. We also received a SALP 2 rating in the security functional area during the SALP 9 rating period. Based on our evaluation of the information contained in the SALP 9 report and our own assessment of the security program, a number of initiatives were implemented to improve our performance in this area.

The improvements that resulted from these initiatives were noted in the SALP report. Plant and corporate management support was rated as "excellent," an improvement from the "good" rating received during the previous assessment period. Our training and qualification program was previously rated as "good" and had improved as noted by the current "excellent" rating. In addition, our engineering and security support in the areas of vital area door control and the effectiveness and reliability of perimeter cameras was rated as "excellent" based on the NRC evaluation.

Our tracking and trending program was rated as "good" and was noted as continuing to improve. The maintenance work request volume and timeliness of repair of security related equipment was noted as having improved and was rated as "good."

The SALP report identifies our enforcement history in the security functional area as having declined. Based on our assessment of the five violations received in this area, we believe that a direct numerical comparison to the three violations received during the previous SALP period does not represent a valid comparison of the overall enforcement history.

Two of the violations were based on the failure to maintain an inventory of some in-core detectors and for the failure to maintain adequate disposal records for these detectors. This incident was self-identified and also concerns an event which occurred more than ten years ago. We believe the two violations are not representative of the current PBNP security program.

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One violation concerning our Fitness-for-Duty program resulted from an unusual break in communication within the security group. We believe this communication break was an isolated incident and is not indicative of a programmatic weakness in the security area.

Wisconsin Electric believes that management support of the security program has been effective and has demonstrated improvement in ensuring consistency in the day-to-day operations during this rating period. We will continue to provide the necessary management support to ensure success in the security program.

Finally, during the NRC presentation of the SALP rating in the security functional area, a challenge was identified regarding self assessments. The SALP report had no reference to this concern. Additionally, the NRC comments presented during our meeting, did not provide adequate basis for us to assess this orally identified weakness. We would appreciate any additional information you could provide to us with regard to this concern for our further review.

Again, we would like to thank you for the information exchange that occurred during our meeting on June 17, 1993. We would also appreciate consideration of our comments with respect to security and the rating that was given in that area. If you have any additional questions, please contact us.

Sincerely,



Bob Link
Vice President
Nuclear Power

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cc: NRC Document Control Desk
NRC Resident Inspector