

June 18, 1982

Docket No. 50-266

Docket No. 50-301

Wisconsin Electric Power Company

ATTN: Mr. Sol Burstein

Executive Vice President

Power Plants

231 West Michigan

Milwaukee, WI 53201

Gentlemen:

This is to confirm the conversation between Mr. R. E. Link and Mr. Hague of the Region III staff scheduling June 23, 1982 at 3:00 p.m. as the date and time to discuss the Systematic Assessment of Licensee Performance (SALP) for the Point Beach Nuclear Plant. This meeting is to be held at the Region III Office, 799 Roosevelt Road, Glen Ellyn, Illinois.

Mr. James G. Keppler, the Regional Administrator, and members of the NRC staff will present the observations and findings of the SALP Board. Since this meeting is intended to be a forum for the mutual understanding of the issues and findings, you are encouraged to have appropriate representation at the meeting. As a minimum, we would suggest you, Mr. C. W. Fay, Mr. G. A. Reed and managers for the various functional areas where problems have been identified attend the meeting.

The enclosed SALP Report which documents the findings of the SALP Board is for your review prior to the meeting. Subsequent to the meeting the SALP Report will be issued by the Regional Administrator.

Enclosure 1 to this letter summarizes the more significant findings identified in the SALP Board's evaluation of the Point Beach Nuclear Plant for the period of November 1, 1980 to April 1, 1982.

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If you desire to make comments concerning our evaluation of your facility, they should be submitted to this office within twenty days of the meeting date. Otherwise, it will be assumed that you have no comments.

In accordance with Section 2.790 of the NRC's "Rules of Practice" Part 2, Title 10, Code of Federal Regulations, a copy of this letter, the SALP Report, and your response and commitments (or your comments, if any) will be placed in the NRC's Public Document Room when the SALP Report is issued.

Comments requested by this letter are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-5111.

If you have any questions concerning the SALP Report of the Point Beach Nuclear Plant we will be happy to discuss them with you.

Sincerely,

J. A. Hind, Director
Division of Emergency Preparedness
and Operational Support

Enclosures:

- 1. Significant Findings
- 2. Point Beach Nuclear Plant
SALP Report (5 copies)

cc w/encls:
Resident Inspector, RIII

RIII
KAC
Tambling/so
6/14/82

RIII
CSP
Paperiello
6/17/82

RIII
SS
Spessard
6/16

RIII
N
Norelius
6/17

RIII
JK
Davis

RIII
JK
Keppler
6/18/82

RIII
JK
Hind
6/18

ENCLOSURE 1

Significant SALP Report findings for the Point Beach Nuclear Plant.

General Observations

Point Beach operations during the SALP 2 evaluation period continued to be very reliable. However, there was a significant increase in the number of items of noncompliance. The increase is attributable to the lack of management attention and involvement necessary to maintain the discipline that has characterized the performance of Point Beach during previous years, and apparently stems from the loss of experienced personnel. This loss combined with the increased regulatory requirements and the more extensive maintenance caused by the steam generator tube corrosion have strained the licensee's resources.

The rate of noncompliance increased substantially in SALP 2 compared to the SALP 1 rate. In the later part of the period, there appeared to be an improvement, as only 21 percent of the noncompliances have occurred in the last one-third of the evaluation period. The more serious noncompliance items were caused by failure to correctly lineup or return equipment to normal for maintenance or surveillance testing. This problem was corrected during the latter part of the evaluation period.

In light of increasing regulatory and staffing requirements, the replacement of experienced personnel in some cases has not been timely. The Training Superintendent position was vacant for 15 months and the new position of Superintendent of Technical Services has not yet been filled.

The decline in performance has not resulted in unsatisfactory operations. Only two reactor trips at each unit were caused by personnel error. These contributed 2.6 outage days at Unit 1 and only a few hours at Unit 2. The overall operating efficiency during the evaluation period was 77 percent for Unit 1 and 92 percent for Unit 2.

Functional Areas

Plant Operations

The increased scope and number of items of noncompliance in this area appears to be the result of loss of experienced personnel with resulting weaknesses in management overview of operations. Corrective actions early in the evaluation period appeared to be aimed at the specific event and did not address the root causes. In this area, the decline in frequency of events in the last half of the evaluation period may have resulted from accelerated personnel replacement and the separation of operating activities and licensing activities.

The licensee should give more attention in training and supervision to assure that the apparent reduction of personnel error related events will continue.

Maintenance and Modifications

The capabilities of the licensee's maintenance staff are attested to by the small amount of plant down time attributable to unanticipated equipment problems. However, the maintenance program suffers from weaknesses which have resulted in several personnel error reportable events (46 percent of LER's in this area) and a 76 percent increase in items of non-compliance which, if not corrected, could compromise the efforts of the department. Each of these weaknesses, failure to control contractor activity, failure to control modifications, failure to control cleanliness, and failure to administer the system can be attributed to inadequate programmatic overview and attention to detail. Increased effort is needed to effectively reduce events in this area.

Surveillance and Inservice Testing

Again in this area both noncompliances and reportable events caused by personnel error have increased over the last evaluation period. The predominant cause is failure to maintain test procedures current and follow them. Improper lineups for tests or following tests accounted for three of the five noncompliances and was the assigned cause of three reportable events. The licensee should put greater emphasis in this area to prevent incorrect lineups and assure adherence to procedures.

Security

The licensee's attitude toward the security program appears to have become more positive; however, noncompliances during this evaluation period increased 59 percent over the previous period. The causes of the noncompliances were related to inadequate procedures, failure to follow procedures, computer/electronic deficiencies and hardware inadequacies. The licensee needs to place additional effort in this area to resolve these weaknesses.

Emergency Preparedness

A number of deficiencies were identified during the Emergency Preparedness Implementation Appraisal and during the full scale exercise carried out in March 1982. All the items have been resolved or committed to but the minimum staffing guidance in NUREG-0564, (Table B-1). Region III and NRR are currently examining the licensee's position in this matter. The licensee needs to increase management attention in this area.