



**Wisconsin Electric** POWER COMPANY  
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September 24, 1982

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

Attention: Mr. R. A. Clark, Chief  
Operating Reactors Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301  
ADDITIONAL INFORMATION NUREG-0737  
ITEM II.B.2, PLANT SHIELDING  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter to you dated July 20, 1982, Wisconsin Electric Power Company provided additional information and justification for the implementation schedule proposed for NUREG-0737, Item II.B.2, "Plant Shielding", and several other items. Our latest implementation schedule had been provided with our letter dated April 26, 1982. On September 14, 1982 we received a telephone call from Mr. Clark requesting additional information regarding the interim mitigating measures taken while the analyses and plant modifications planned in response to Item II.B.2 are being completed.

In response to your telephoned request, we explained that the following actions have been or, in the event of an accident, would be taken. Several of the plant emergency response procedures have been revised to specify necessary precautions required before post-accident re-entry into the auxiliary building or facade. These procedures require that an evaluation of the area radiation monitoring system readouts and radiological hazards be completed prior to re-entry. Appropriate radiation surveys of designated areas are required before these areas may be entered to accomplish accident mitigating activities. Re-entries must be authorized by the Site Manager, Duty and Call Health Physics Supervisor, and the Duty Shift Supervisor and are to be accomplished under the direct supervision of health physics personnel. Hence, although the shielding modifications are not yet completed, we are aware, based on the analyses, calculations, and studies done to date, of the potential radiation problem areas. Based on this knowledge and the evaluation of area radiation monitor readouts and radiation survey results, we would instruct personnel regarding radiation levels which they might encounter and how to minimize their stay times or provide necessary temporary shielding so that applicable dose limits would not be exceeded. These actions could also include, if necessary, prior flushing of safety injection and residual heat removal lines to further minimize radiation sources in the vicinity of required maintenance activities.

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September 24, 1982

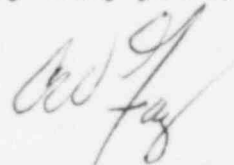
None of the areas which we have identified as requiring the addition of permanent shielding are locations which require continuous or frequent personnel access. The safety related 480 volt motor control centers would require access only if breaker maintenance became necessary. In that case temporary shielding, line flushing, or other means would be utilized to minimize exposures. Periodic access to the C-59 control panel is only required for the operation of non-safety related auxiliary systems. Temporary shielding and line flushing may also be used at this location to minimize exposure.

Our analysis of control room doses indicated a need to shield the control room doors and windows based on a number of very conservative source term assumptions. While the current reanalysis will be completed in about one week, preliminary results indicate only a minor amount of shielding is required (on the order of  $\frac{3}{4}$ " lead equivalent) to reduce the dose rate to control room personnel during the early hours of the accident. In the event of a major accident, operators will be instructed to avoid door and window areas to the extent practicable. This can be done without adversely impacting their freedom to respond to the accident.

It is important to note that the requirement for additional shielding is predicated upon a source term resulting from gross core damage including significant core melting and significant core fission product inventory release in accordance with the assumptions specified by NUREG-0737. Any postulated accident which resulted in core damage less than that assumed in these analyses would, of course, result in correspondingly lower dose rates in the plant areas. The "standard" major LOCA, for example, would not require any additional shielding. In fact, a partial core melt involving only a few assemblies would similarly not require additional shielding.

We believe that our procedural requirements for accurate radiation surveys prior to entry and our plans to utilize temporary shielding, and other measures to reduce localized high radiation areas as necessary, provide adequate mitigating factors to permit continued plant operation while the shielding installations we have discussed with you previously are being implemented.

Very truly yours,



Assistant Vice President

C. W. Fay

cc: NRC Resident Inspector