



**Wisconsin
Electric**
POWER COMPANY

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NRC-94-031

April 13, 1994

Document Control Desk
U.S. NUCLEAR REGULATORY COMMISSION
Mail Station P1-137
Washington, DC 20555

Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO NOTICE OF VIOLATION
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter for Mr. L. R. Greger dated March 17, 1994, the Nuclear Regulatory Commission forwarded to Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, the results of a routine safety inspection performed by Messrs. K. R. Jury and J. Gadzala from January 19 through February 28, 1994. This inspection report included a Notice of Violation (Notice). The Notice describes a violation of 10 CFR Part 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings."

We have reviewed this Notice and, pursuant to the provisions of 10 CFR 2.201, have prepared a written response of explanation concerning the identified violation. Our written response is included as an attachment to this letter.

10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that procedures include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished. This notice identifies a situation in which one of the emergency diesel generators became inoperable due to inadequate maintenance. Post-maintenance checks were not adequate to detect this problem.

We believe that the attached reply is responsive to your concerns and fulfills the requirements identified in your March 17, 1994, letter.

If you have any questions or require additional information regarding this response, please contact us.

Sincerely,

Bob Link
Vice President
Nuclear Power

CAC/jg

cc: Regional Administrator, NRC Region III
NRC Resident Inspector

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Q PDR

Handwritten initials: JEO

RESPONSE TO NOTICE OF VIOLATION

WISCONSIN ELECTRIC POWER COMPANY
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
DOCKETS 50-266 AND 50-301
LICENSE NOS. DPR-24 AND DPR-27

During a routine safety inspection performed by Messrs. K. R. Jury and J. Gadzala from January 19 through February 28, 1994, one violation of NRC requirements was cited. The identified violation was classified as a Severity Level IV. Inspection Report Nos. 50-266/94002(DRP) and 50-301/94002(DRP) and the Notice of Violation (Notice) transmitted to Wisconsin Electric on March 17, 1994, provide details regarding the violation. We agree that the events and circumstances described in the Notice are accurately characterized.

In accordance with the instructions provided in the Notice, our reply to the violation includes: (1) the reason for the violation; (2) the corrective action taken; (3) the corrective action to be taken to avoid further violations; and (4) the date when full compliance will be achieved.

VIOLATION

1. 10 CFR 50, Appendix B, Criterion V, "Instructions, Procedures, and Drawings," requires that procedures include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been satisfactorily accomplished.

Contrary to the above, on or about February 3, 1994, Procedure RMP 43, "Diesel Annual Inspection," did not contain appropriate acceptance criteria with respect to clearances and interference in rotating machinery to identify that maintenance had been improperly performed on the G01 diesel generator.

RESPONSE TO VIOLATION

1. Reason for Violation

EDG G01 was declared inoperable at 2204 hours on February 8, 1994, due to power fluctuations as seen on the varmeter in the control room during a load test. Trouble shooting determined that the power fluctuations were caused by shorting of the DC exciter voltage between a rotating bus bar and one of the two stationary brush jumper cables which connects the slip rings within the generator.

The brush jumper cable had been installed in an improper orientation 5 days earlier on February 3, 1994, during the annual maintenance outage on EDG G01. The brush jumper cable was inspected as part of the routine EDG annual maintenance. Based on the inspection, in which some damaged and loose strands of the cable were noted near the lug, the brush jumper cable was removed, re-lugged, and replaced. The amount of damaged and loose strands did not pose an operability concern for the EDG; therefore, the re-lugging was not considered absolutely necessary and was performed as normal corrective maintenance.

A Human Performance Root Cause evaluation (HPRC 94-02) was performed and documented for this event to determine the root causes for the improper installation of the brush jumper. HPRC 94-02 concludes that the improper installation of the brush jumper cable was caused by: (1) lack of adequate work control, and (2) lack of adequate post-maintenance testing for the maintenance that was performed, which should include inspection for interference while rotating the generator.

2. Corrective Action Taken

The immediate corrective action that was completed for this situation of both emergency diesel generators being inoperable was to expedite the return to service of one of the emergency diesel generators (EDG G01). The damaged bus bar and jumper cable were replaced by using the identical parts from EDG G02. Proper clearance between the brush jumper cable and the rotating bus bars was verified, prior to returning EDG G01 to service.

3. Corrective Action to be Taken to Avoid Further Violations

Long term corrective actions include:

1. The plant policy and procedure for performing maintenance that is beyond the scope of the preventive maintenance or surveillance work control documents that are being used will be revised to require appropriate work controls for the corrective maintenance being performed. For example, in this case, the routine maintenance procedure used for the EDG G01 maintenance required an inspection of the generator. Based on this inspection, the brush jumper cable was re-lugged. The work control documents should have been revised or supplemented to provide additional work controls for the re-lugging of the brush jumper cable. This corrective action will be implemented by May 31, 1994.

2. . Review and revise the Post Maintenance Test Procedure (PBNP 3.2.6) and/or other procedures as necessary to include manual rotation and inspection to verify adequate internal clearance after removal and replacement of parts near rotating equipment. This corrective action will be completed by May 31, 1994.

3. Date When Full Compliance Will be Achieved

Full compliance will be achieved by May 31, 1994, when the long-term corrective actions are completed.