

DCD/DCB
(RIDS)

November 30, 1990

Docket No. 50-266
Docket No. 50-301
EA No. 90-159

Wisconsin Electric Power Company
ATTN: Mr. C. W. Fay
Vice President
Nuclear Power
231 West Michigan Street - P379
Milwaukee, WI 53201

Gentlemen:

SUBJECT: NOTICE OF VIOLATION (INSPECTION REPORTS NO. 50-266/90201,
50-301/90201; AND 50-266/90018(DRS), 50-301/90018(DRS))

This refers to the special electrical distribution system functional inspection (EDSFI) at the Point Beach Nuclear Plant, Units 1 and 2, conducted on March 12 through 16 and on March 26 through April 6, 1990, and the follow-up inspection conducted August 20 through 24, 1990, and authorized by NRC License Nos. DPR-24 and DPR -27. During the inspection, violations of NRC requirements were identified, and on October 4, 1990, an enforcement conference was held in the Region III office between Mr. J. Zach, and other members of your staff, and Dr. C. J. Paperiello, and other members of the NRC staff. A copy of NRC inspection Reports were mailed to you on June 1, 1990 and on September 27, 1990, and a copy of the enforcement conference report was sent to you on October 12, 1990.

During the enforcement conference we discussed various violations pertaining to (1) inadequate design controls resulting in an inaccurate emergency diesel generator loading calculation, and failure to consider consequences of a seismic event when racking out the 4.16 kV tie breakers, (2) failure to perform calibration of the undervoltage function on some safety-related inverters, and (3) failure to exert adequate controls over calibration of safety-related relays. The first two of these violations appear to be the result of a weakness in the design review process in that all aspects of the design were not considered when performing work. The last violation shows a weakness in your quality assurance program in that it did not extend to cover calibration of non-technical specification safety-related components. These are considered Severity Level IV violations and are contained in the enclosed Notice of Violation.

Also discussed during the enforcement conference was seismic qualification for the emergency diesel generator fuel oil supply system, which led to your declaring both diesels inoperable during the course of the EDSFI. The major

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factor contributing to this issue was an unclear original design and licensing basis for the emergency diesel generator fuel oil supply system. The underground emergency fuel oil tank was designed as a seismic Category 1 structure to meet the seismic requirements of the fuel oil pumphouse. However, this qualification did not appear to extend to the supply piping itself. The original Point Beach design basis did not consider the fuel oil supply system to be safety-related. We understand that you recognized that the fuel oil supply system performed a safety-related function and were in the process of upgrading it. Additionally, the overall efforts that you have undertaken in order to reconstitute your design basis were considered. The NRC considers this issue to be a violation against Technical Specification 15.3.7. However, in view of the above, NRC has determined that no violation will be issued for this matter.

Finally, issues dealing with cable tray overfill, single failure concerns on the 480 V tie breakers, and cable separation for both trains of both units of the component cooling water auto start signal as well as the Unit 2 auxiliary feedwater undervoltage anticipatory start signal were mentioned at the enforcement conference. These failures to meet your Final Safety Analysis Report have been corrected and were all original design issues of low safety significance. Therefore, no violation will be issued for these matters.

You are required to respond to this letter and should follow the instructions specified in the enclosed Notice when preparing your response. In your response, you should document the specific actions taken and any additional actions you plan to prevent recurrence. After reviewing your response to this Notice, including your proposed corrective actions and the results of future inspections, the NRC will determine whether further NRC enforcement action is necessary to ensure compliance with NRC regulatory requirements.

In accordance with 10 CFR 2.790 of the NRC's "Rules of Practice," a copy of this letter and its enclosure will be placed in the NRC Public Document Room.

The responses directed by this letter and the enclosed Notice are not subject to the clearance procedures of the Office of Management and Budget as required by the Paperwork Reduction Act of 1980, PL 96-511.

Sincerely,
Original signed by
A. Bert Davis
A. Bert Davis
Regional Administrator

Enclosures:

- 1. Notice of Violation
- 2. Inspection Report
Nos. 50-266(301)/90201,
50-266(301)/90018(DRS)

See Attached Distribution

RIII <i>RL</i> Lougheed/db 11/27/90	RIII <i>PM</i> Martin 11/27/90	RIII <i>WGA</i> Miller 11/27/90	RIII <i>CP</i> Pederson 11/27/90	RIII <i>CP</i> Papariello 11/29/90	RIII <i>D</i> Davis 11/27/90
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*REP
BEA file*

November 30, 1990

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cc w/enclosures:

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