



Wisconsin
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VPNPD-90-494
NRC-90-124

December 18, 1990

Mr. A. Bert Davis, Regional Administrator
U.S. NUCLEAR REGULATORY COMMISSION
Region III
799 Roosevelt Road
Glenn Ellyn, Illinois 60137

Dear Mr. Davis:

DOCKET NUMBERS 50-266 AND 50-301
RESPONSE TO INSPECTION REPORT
NOS. 50-266/90001 AND 50-301/90001
SYSTEMATIC ASSESSMENT OF LICENSEE PERFORMANCE
POINT BEACH NUCLEAR PLANT

Your letter dated October 30, 1990, transmitted your Systematic Assessment of Licensee Performance (SALP) for our Point Beach Nuclear Plant for the period April 1, 1989, through August 31, 1990. We appreciated the opportunity to discuss your assessment of our performance at our November 19, 1990, meeting. We thank you for the positive and constructive comments made regarding our performance as summarized in the SALP report and as discussed during the November 19 meeting. We agree with your assessment of our performance.

Your assessment acknowledged high performance ratings in the Plant Operations and Maintenance/Surveillance categories. These high ratings were in part attributable to our strong, knowledgeable, and professional operations staff. Our operations staff continues to maintain good awareness of plant conditions. Professional atmosphere and "black board" conditions are maintained in the control room. As you identified, our high capacity factors and very low forced outage rates are achieved by the diligence of our operations staff, the quality of work performed by our employees, and the effectiveness of our maintenance and surveillance programs. We remain very proud of these accomplishments and the performance results achieved in these areas.

Recurring high radiation area control and unplanned extremity exposure events, which occurred early in the assessment period, contributed to a lower performance rating in the area of Radiological Controls. We believe that training and management enhancements have corrected the weaknesses which contributed to the

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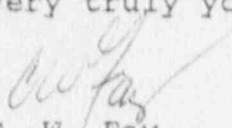
occurrence of these events. Efforts which have been initiated to enhance our ALARA program are expected to additionally improve performance in the Radiological Controls functional area.

As was discussed at the November 19 meeting, we have a number of actions ongoing and specific programs in place or planned which are intended to continue to improve overall plant performance. As you noted during the November 19 meeting, we believe these actions have resulted in positive performance trends in all of the assessed functional areas. Your report specifically identified our efforts to increase our staff resources, improve our corrective action program, continue our safety system functional inspection program, and to initiate a design reconstitution program. We expect that these and other initiatives will be effective in contributing to improved plant performance and safety.

The following comments are provided on two specific statements included in the SALP report. Section IV.E.1, which summarizes Security, states "the licensee also committed to a major security hardware upgrade program to be completed over the next 3 years." It should be understood that although we are making plans to perform this hardware upgrade program, a formal commitment to complete this work has not been made to the NRC. Section IV.C.1, which summarizes Maintenance/Surveillance, discussed incidents requiring LERs and identified five LERs which were caused by personnel errors. Although, we concur that personnel error likely contributed to these incidents, we believe the report improperly attributes all of these events to surveillance work performed by instrument and control technicians. Also we believe that the statement "a lack of attention to detail on part of the instrument and control technicians" improperly characterizes the root cause of these events.

We are particularly pleased that the SALP report noted a significant improvement has been made in our communications with and responsiveness to the NRC. Continued improvement in communications remains one of our principal objectives.

Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Copies to NRC Document Control Desk
NRC Resident Inspector