



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

November 29, 1982

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
REPLY TO INSPECTION REPORT
NOS. 50-266/82-12 (DETP) AND 50-301/82-12 (DETP)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This is in completion of our response, initiated on October 15, 1982, to your letter of September 15, 1982, which transmitted the special safety inspection conducted on May 3-4 and June 15, 1982 by Messrs. P. C. Lovendale and R. L. Hague. At the time of our October 15, 1982 response, additional time was requested to adequately reply to the question of the control of areas within containment where the radiation levels exceed 1000 mRem/hr.

Prior to our October 15, 1982 response, we realized there were inadequacies in our Technical Specification 15.6.11, "Radiation Protection Program". These inadequacies were resolved in our submittal of Technical Specification Change Request No. 84 which, after several discussions with various members of the NRC staff, has been approved. Among other changes, this revised Technical Specification now requires that "for individual areas accessible to personnel with radiation levels such that a major portion of the body could receive in one hour a dose in excess of 1000 mRem, that are located within large areas, including containment, where no enclosures exist for purposes of locking, and no enclosures can be reasonably constructed around the individual areas, then that area shall be roped off, conspicuously posted, and a flashing light shall be used as a warning device". These revised Technical Specifications were implemented on November 19, 1982 and described to the plant staff via a health physics standing order on that date.

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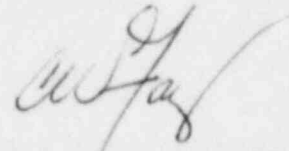
Mr. J. G. Keppler

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November 29, 1982

We believe that the above action, in concert with the plant staff's approval on November 18, 1982 of the modifications discussed in our October 15, 1982 response, brings to a conclusion our responses in this matter. Should any further questions arise regarding these matters, please feel free to call us.

Very truly yours,

A handwritten signature in cursive script, appearing to read 'C. W. Fay', written in dark ink.

Assistant Vice President

C. W. Fay

Copy to NRC Resident Inspector

Items 2 and 5 are applicable to your contention and were considered in arriving at our decision to issue a notice of violation. Item 4 was considered, but in our view, has little bearing on who was at fault for the entry. On the one hand, it demonstrates that the operator committed numerous errors during this incident; on the other hand, it raises questions regarding the adequacy of your training and auditing programs for ensuring procedural adherence.

In summary, we disagree with your conclusion that the evidence clearly demonstrates the sole cause of this incident to be the inattentiveness of an individual. We believe the general survey requirement of Procedure HP 8.2 was not met.

With regard to your request to withdraw violation 8.c, we have reviewed your request and conclude that the citation is valid. Procedure HP 8.2 states: "Area surveys shall be completed in potentially hazardous areas prior to personnel entry." We recognize that this is a generalized requirement which may be modified in special situations. However, as stated in your letter dated October 15, 1982, the conditions specified in Procedure HP 2.7 which would allow modification of the general survey requirement were not met. Therefore, no modification of the general survey requirement of Procedure HP 8.2 was applicable.

No response to this letter is necessary. Your cooperation with us is appreciated.

Sincerely,

Original signed by
A. Bert Davis

James G. Keppler
Regional Administrator

cc: J. J. Zach, Plant Manager

cc w/ltrs dtd 10/15/82 and
11/29/82:

DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
John J. Duffy, Chief
Boiler Section
Peter Anderson, Wisconsin's
Environmental Decade
Stanley York, Chairman
Public Service Commission

OFFICE

SURNAME

DATE