



Wisconsin
Electric
POWER COMPANY

251 W. Michigan, P.O. Box 2046, Milwaukee, WI 53201

(414) 221-2345

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VPNPD-91-084
NRC-91-023

March 7, 1991

Mr. A. Bert Davis, Regional Administrator
U. S. NUCLEAR REGULATORY COMMISSION, REGION III
799 Roosevelt Road
Glen Ellyn, IL 60137

Dear Mr. Davis:

DOCKET NOS. 50-266 AND 50-301
REPLY TO NOTICE OF DEVIATION
INSPECTION REPORTS 50-266/90027 AND 50-301/90027
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter of February 5, 1991, transmitted the subject inspection report. The report contained one Notice of Deviation associated with the Quality Assurance (QA) Program as described in the Final Safety Analysis Report (FSAR), Section 1.8. We received your letter on February 11, 1991.

The Notice of Deviation cites discrepancies between actual practices being implemented and our approved QA Program. FSAR, Section 1.8, "Quality Assurance Program," states that "In matters related to quality assurance, the manager (Point Beach Nuclear Plant) remains cognizant through direct involvement and through input from various sources including the in-plant Quality Assurance Coordinator (QAC) and QA Representatives. The Quality Assurance Coordinator and QA Representatives are appointed by the Manager and are considered concurrent assignments." The deviation notes that we no longer utilize the position of QA Representative as described in the FSAR and plant procedures, and therefore, none are appointed. Additionally, the current QA Coordinator does not meet the experience level criteria specified in the procedure.

We acknowledge that our current practice is not consistent with the description in the FSAR, Section 1.8. The current QA Program description in the FSAR is out of date because of timelags associated with our annual updates to Section 1.8, NRC acceptance of changes, and the subsequent issuance of these changes during the FSAR update in accordance with 10 CFR 50.54(a). We are presently taking steps to resolve this problem. A review of Section 1.8 was initiated in late January, and proposed changes and updates will be submitted for NRC acceptance in March. This early update submittal

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Mr. A. Bert Davis
March 7, 1991
Page 2

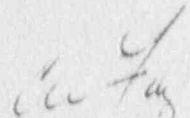
should allow us to issue Section 1.8 changes as part of our annual FSAR revisions which are normally issued in July. Future Section 1.8 updates will also be handled in this manner.

The specific discrepancies related to the QA Coordinator (QAC) and QA Representatives result from evolving changes in quality assurance organizational functions. In April 1989 a Site Quality Assurance group was established. At that time, some of the functions previously performed by the QAC and QA Representatives were transferred to the Site QA (SQA) group. Since that time, other functional changes have occurred and currently all functions previously performed by the QAC and QA Representatives are now performed by SQA. We have, therefore, found it unnecessary to maintain the QAC and QA Representative assignments. As stated above, these changes have not yet been reflected in revisions to Section 1.8 in a timely manner. The 1991 update of the FSAR, Section 1.8 will reflect these changes, and administrative procedures PBNP 1.7.3 ("Quality Assurance Coordinator") and PBNP 1.7.4 ("Quality Assurance Representatives") will be canceled by March 15, 1991.

In light of the discrepancies which were noted, we have also determined to take an overall look at our entire QA Program. The QA Section is in the process of obtaining an independent third-party assessment of the WE QA program. We believe this self-initiated assessment will give us a more complete perspective on our quality assurance practices and their implementation. Following completion of this assessment, a plan will be developed to address any issues which may be identified. We anticipate that performance of this assessment and development of an action plan will be completed by October of this year.

If you have any questions concerning this information, please contact us.

Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Copy to: Document Control Desk
NRC Resident Inspector