Wisconsin Electric
POWER COMPANY

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NRC-94-065

September 12, 1994

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

Gentlemen:

DOCKETS 50-266 AND 50-301
REPLY TO NOTICE OF VIOLATION
INSPECTION REPORTS 50-266/94015(DRP); 50-301/94015(DRP)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On August 11, 1994, the Nuclear Regulatory Commission forwarded to Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, the results of a fire protection inspection conducted by Mr. D. Schrum. This inspection report also included a Notice of Violation (NOV) containing one Severity Level IV violation.

We have reviewed this NOV 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.

The Point Beach Technical Specifications require adherence to fire protection program implementing procedures. Additionally, Point Beach Administrative Control Procedure 3.4.1, "Ignition Control Procedure," requires that all flammable liquids and any combustible materials within 35 feet of the work site be relocated or protected with an accepted protective covering. Contrary to these requirements, on July 12, 1994, the fire protection inspector observed grinding activities in the turbine building that did not have combustibles removed or covered within 35 feet of these activities. We agree that this does constitute a Severity Level IV violation.

Sincerely,

for

Bob Link
Vice President
Nuclear Power

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FDP/jg
Enclosure
cc: NRC Regional Administrator
NRC Resident Inspector

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RESPONSE TO NOTICE OF VIOLATION

Wisconsin Electric Power Company
Point Beach Nuclear Plant, Units 1 and 2
Docket Nos. 50-266 and 50-301
License Nos. DPR-24 and DPR-27

During a fire protection inspection conducted by Mr. D. Schrum from July 11 through July 19, 1994, one violation of NRC requirements was identified. This violation was classified as Severity Level IV. Inspection Report Nos. 50-266/94015(DRP) and 50-301/94015(DRP) and the Notice of Violation (NOV), transmitted to Wisconsin Electric on August 11, 1994, provide details regarding this violation.

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

VIOLATION:

Point Beach Technical Specification 15.6.8.1.8 requires adherence to fire protection program implementing procedures. Point Beach Administrative Control Procedure 3.4.1, "Ignition Control Procedure," Revision 12, requires that all flammable liquids and any combustible materials within 35 feet of the work site be relocated or protected with an accepted protective covering.

Contrary to the above, on July 12, 1994, the inspector observed grinding activities in the turbine building that did not have combustibles removed or covered within 35 feet of these activities. We agree that the events and circumstances described does constitute a violation of Point Beach Technical Specification 15.6.8.1.8 and a Severity Level IV violation.

REASON FOR VIOLATION:

On July 12, 1994, grinding activities were going to be performed in the overhead of the 8-foot elevation of the turbine hall. In accordance with the requirements of Point Beach Administrative Control Procedure (PBNP) 3.4.1, "Ignition Control Procedure," the work site was inspected prior to the commencement of work. The person who performed the inspection observed that an acetylene tank and associated welding cables were located on the floor in the vicinity of the proposed job site. The procedure requires that all flammable liquids and any combustible materials within 35 feet of the job site should be relocated or protected with an acceptable protective covering.

In lieu of relocating the acetylene tank and associated welding cables, it was decided that a protective covering would be used to prevent the spread of sparks and grinding particles. This protective covering was wrapped around the cable tray located directly below where grinding was to be performed in order to protect the cable tray and prevent the spread of sparks and grinding particles.

The tank and welding cables were not in the direct vicinity of the grinding activities, and although located within 35 feet of this activity, were not expected to be exposed to hot sparks. Additionally, a fire watch was posted in the area next to the combustible material, allowing him to see if the combustible material would have been exposed. If so, the combustibles would have been removed. The person who performed the inspection believed that this arrangement satisfied the requirements of PBNP 3.4.1.

The fire watch was in place during the entire period when grinding activities were being performed. He was provided with the proper fire protection equipment and was attentive to his duties. Subsequent to the event, this fire watch was questioned by his supervisor. The fire watch stated that neither sparks nor grinding particles appeared to travel past the immediate vicinity of the installed protective covering when the grinding activities were in progress.

CORRECTIVE ACTION TAKEN AND RESULTS ACHIEVED:

On July 12, 1994, when the condition was identified, the Nuclear Power Business Unit fire protection engineer and the plant fire protection and safety coordinator immediately contacted the supervisor responsible for the grinding activities and asked him to have the combustible material removed from the area to address the NRC inspector's concerns. The supervisor complied with this request and removed the materials from the area. A condition report was subsequently initiated to investigate the circumstances of the event.

Discussions were also held with the training group following this event. In January 1994, the training group completed an evaluation of its continuing training program. This evaluation revealed several areas for improvement. One of the areas identified was the ignition control program. Previously, continuing training on this subject required that trainees read PBNP 3.4.1 and subsequently complete a written examination on its contents. Following the training evaluation, the lesson plan on this subject was revised to include more examples of possible hot work scenarios, along with a walkthrough of the procedure. This improved training has been in place since June 1994 and is part of the initial training program for management employees with unescorted access to Point Beach Nuclear Plant.

CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS:

In response to the event, an evaluation of the ignition control program is being performed. This evaluation is being performed to identify any problems with the program, as well as to develop corrective measures to improve the overall program. The results and recommendations of this evaluation will be submitted to the plant manager by November 14, 1994.

In addition to the ongoing evaluation of the ignition control program, a review of PBNP 3.4.1 was performed. This review determined that the procedure adequately describes the responsibilities of a fire watch and any person authorized to initiate and sign ignition control permits. However, this procedure may not provide sufficient guidance for the identification of combustible materials or possible methods for protecting the job site. Therefore, the Nuclear Power Business Unit fire protection engineer will review and revise PBNP 3.4.1 to clarify existing information, as well as to include additional guidance on the above topics. We anticipate completing this procedural revision by December 19, 1994.

DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED:

Wisconsin Electric will be in full compliance once PBNP 3.4.1 has been revised. We anticipate completing this revision by December 19, 1994.