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VPNPD-91-286
NRC-91-084

August 23, 1991

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

Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORTS 50-266/91012 (DRSS);
50-301/91012 (DRSS)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This letter is in response to the Notice of Violation enclosed with your letter of July 24, 1991. The Notice of Violation is associated with the reactive inspection of the Point Beach Nuclear Plant Physical Security Program conducted by T. Madaeda between May 21 and June 10, 1991.

The violation identified in the Inspection Report and summarized in the Notice of Violation was the failure to positively control access of personnel and material into containment on two occasions in accordance with the requirements of Section 7.0 of the Point Beach Nuclear Plant Security Plan. Specifically, on October 10, 1990, the security officer and, on April 28, 1991, the unarmed watchman assigned to control access to an open containment hatch were determined to be asleep. We concur that the repeat occurrence of the event is appropriately characterized as a Severity Level IV Violation.

Both occurrences were self-identified. The October 10, 1990 incident was reported in accordance with 10 CFR 73.71, Appendix G, as a violation of the Point Beach Nuclear Plant Security Plan by Safeguards Event Report 90-504-00. The April 28, 1991 incident was evaluated to be a loggable safeguards event, though not requiring a Safeguards Event Report, in accordance with the guidance of Generic Letter 91-03, Reporting of Safeguards Event. In addition to the incidents of sleeping, a similar occurrence of inattentiveness was self-identified on May 7, 1991.

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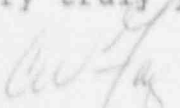
Our evaluation identified the common root cause to be the duration of that post rotation in combination with inactivity. The post rotation was two hours in all cases. The corrective action to preclude recurrence was identified after the first incident. This included changing the post rotation from two hours to one hour. This change was implemented for the remainder of the 1990 Unit 2 refueling and maintenance outage. The one-hour rotation, however, was not implemented at the time of the other incidents during the 1991 Unit 1 refueling and maintenance outage due to manpower restrictions.

To preclude future recurrence, the normal duration of that post rotation will be one hour. The post instructions will be changed to include this guidance prior to the 1991 Unit 2 refueling and maintenance outage.

In addition to the response to the violation, we were requested to describe our actions to ensure that the employment action which was taken in January 1991 does not discourage other contract security employees from raising security and safety concerns in the future. The potential effect of the employment action on the morale of security officers was anticipated at the time the action was taken. Specific actions were taken to minimize the decline in morale and to encourage its timely recovery. Meetings were held with all of the contract security officers and Point Beach security management to discuss the issues germane to the employment action and to establish future goals. Similar meetings among the security officers, Point Beach security management, and representatives of Fox Valley Technical College were also conducted. We believe morale is currently high due to the open communication and the passage of time. We have also concluded that the employment action has not discouraged the reporting of security or safety concerns. As in the past, the security officers will continue to identify problems and cooperate with our investigators.

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

Very truly yours,


C. W. Fay
Vice President
Nuclear Power

Copies to NRC Regional Administrator, Region III
NRC Resident Inspector