



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

October 14, 1983

Mr. D. G. Eisenhut, Director  
Division of Licensing  
U. S. NUCLEAR REGULATORY COMMISSION  
Washington, D. C. 20555

Dear Mr. Eisenhut:

DOCKETS 50-266 AND 50-301  
EMERGENCY SUPPORT CENTER  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

This is in response to your letter of September 14, 1983 which denied concurrence with Wisconsin Electric's plans to move the Point Beach Nuclear Plant Emergency Support Center from Two Creeks, Wisconsin to our Corporate headquarters in Milwaukee, approximately one hundred miles south of Point Beach.

By letter dated April 6, 1982 to Mr. J. G. Keppler, NRC Region III, Wisconsin Electric requested NRC approval of this relocation and provided our reasons in support of the relocation. We were advised by Region III in a letter dated May 4, 1982 that if we wished to meet with the Commissioners regarding this matter, we should so advise the NRC Staff in Washington. We made this request in a letter to Mr. Chilk dated March 30, 1983 and also requested a copy of the Staff's recommendation regarding our proposal.

We were subsequently advised that we would not be furnished a copy of the Staff's recommendation prior to consideration by the Commissioners. We once again, in a letter dated May 20, 1983 to Mr. Chilk, requested permission to present our views to the Commissioners. As you know, we were not accorded the opportunity to discuss the matter with the Commissioners nor have we been provided with a copy of the Staff's recommendations.

Your September 14 letter presents two bases for denial of our proposed relocation of the Emergency Support Center:

1. Lack of availability for "face-to-face" contact with the NRC Director of Site Operations and other Federal and local officials.
2. Perceived communications problems during the March 1982 exercise.

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Regarding the latter, we do not agree that the problems were as significant as might be interpreted from your comments and were not generally related to Emergency Support Center location. In any case, corrective action has been taken to improve communications. These steps have been effective, as was demonstrated during the September 1983 exercise.

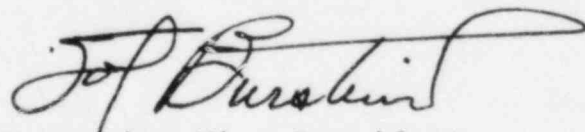
Regarding the first consideration, we believe you have over-emphasized the need for "face-to-face" contact. The State of Wisconsin emergency response facility is in Madison, which is closer to Milwaukee than to Two Creeks; and the county centers are in the cities of Manitowoc and Kewaunee, which are also physically separated from the present Emergency Support Center at the plant site. Only the State of Wisconsin has authority to order protective action, and only the counties can compel the public to take the ordered action. During the crucial first hours or days of a serious accident, the responsible officials will be in their response centers where they have personnel, facility, and logistic support. Any "face-to-face" discussions near Point Beach Nuclear Plant are, therefore, not likely to include senior state or local officials.

Finally, in an attempt to understand better the technical basis for the twenty-mile statement contained in Footnote 1 of Table 2 of NUREG-0696, we submitted a Freedom of Information Act request to the Director, Office of Administration, on June 21, 1983. We have received some material in response to that request, but it provides no information which would lead us to believe that the twenty-mile limit is other than arbitrary limitation. We understand that additional documents will be provided by the NRC, in accordance with our Freedom of Information Act Request; perhaps some technical basis for the limit will be contained therein.

We will await receipt of such further information before taking any additional action. In the meanwhile, we will be moving our Emergency Support Center from the Energy Information Center at Point Beach Nuclear Plant to the newly constructed Site Boundary Control Center, which is also located on the Point Beach Nuclear Plant site.

I would be pleased to discuss our proposal further if you wish to do so.

Very truly yours,



Executive Vice President

Sol Burstein

Copy to NRC Resident Inspector