



**Wisconsin
Electric**
POWER COMPANY

Point Beach Nuclear Plant
6610 Nuclear Rd., Two Rivers, WI 54241

(414) 755-2321

PBL 95-0164

June 29, 1995

Document Control Desk
U.S. Nuclear Regulatory Commission
Mail Station P1-137
Washington, DC 20555

CHANGES TO THE POINT BEACH EMERGENCY ACTION LEVELS

On June 2, 1995, the Point Beach Emergency Action Level Table was revised to incorporate allowable changes addressed in the "Branch Position On Acceptable Deviations to Appendix 1 to NUREG-0654/FEMA-REP-1," dated July 11, 1994. The purpose of this memorandum is to identify for you the major changes made in the June 2 revision and to introduce you to our EAL Technical Basis Document.

The following Deletions and Additions, all of which are UNUSUAL EVENT classifications, were made to EPIP 1.2, "Event Classifications," in accordance with the Branch Technical Position (BTP) paper noted above.

DELETIONS:

1. From Category 13, "Other" -- we removed the initiating condition of "Significant loss of meteorological instruments which impairs ability to perform emergency assessment." The basis for deletion is consistent with that of the BTP paper. We have maintained EALs for loss of indications or alarms. Loss of communications capability remains covered under Non-Emergency Events--one hour reports in accordance with 10 CFR 50.72.
2. From Category 14, "Safety System Functions" -- we removed the initiating conditions of "Unplanned initiation of emergency core cooling with injection to the primary system," "Loss of containment integrity requiring shutdown by Technical Specifications," "Loss of engineered safety feature requiring shutdown by Technical Specifications," and "Loss of fire protection system function requiring shutdown by Technical Specifications (i.e., both fire pumps inoperable and no backup fire suppression system)." The basis for these deletions are consistent with those of the BTP paper. It should be noted that the emergency core cooling with injection initiating condition is for "unplanned" initiation and that we do maintain equivalent initiating conditions, as described in the BTP paper, for NUREG-0654 Unusual Event #5, Alert #5 and Site Area Emergency #1. Also in accordance with the BTP paper for

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removal of the Technical Specification required shutdown initiating conditions described above, we have incorporated an Unusual Event for exceeding Technical Specification required shutdown time limits. This Unusual Event is described further in the "Additions" section.

Due to the deletions described for Category 14, we have eliminated the "Safety System Functions" category from our event classification table.

3. From Category 16, "Serious or Fatal Injury" -- we removed the initiating condition of "Transportation of an externally contaminated and seriously/fatally injured individual from site to hospital." The basis for this deletion is consistent with that of the BTP paper. Again, due to this deletion, we have eliminated the "Serious or Fatal Injury" category from our event classification table.

ADDITIONS:

To Category 11, "Plant Shutdown Function" -- we added the initiating condition of "Inability to reach Technical Specification required shutdown within the specified time limit." The basis for this addition is consistent with that of the BTP paper and warranted in view of the Technical Specification required shutdown Unusual Event deletions describe above.

The remainder of the changes made to our event classification table were administrative in nature (e.g., consistent wording, removal of redundant verbiage, capitalization, etc.) or made for clarification (e.g., the Emergency Action Levels in Category 5, "Abnormal Effluent," used to be the Initiating conditions). The "indications" of an event are found in the Emergency Action Level section throughout the table and, therefore, these were moved for consistency and the Initiating Condition statements added for clarification.

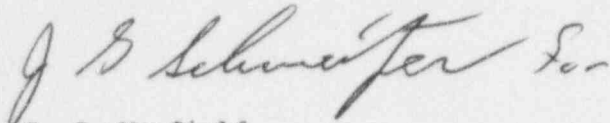
The changes to EPIP 1.2, "Event Classifications," were discussed with, and agreed upon by, the State and local officials prior to the June 2 revision in accordance with Appendix E to 10 CFR Part 50. You will find enclosed copies of the letters sent to us by the State of Wisconsin, Manitowoc County, and Kewaunee County describing our face-to-face discussion of the changes.

Finally, you will find enclosed a Controlled Copy of the Point Beach Nuclear Plant EAL Technical Basis Document. This document was compiled to describe the basis for having the setpoints and indications that we have in our classification scheme. It also provides reasons for excluding some of the Initiating Conditions found in Appendix 1 to NUREG-0654 from the Point Beach classification table. The EAL Technical Basis Document is listed as a reference in EPIP 1.2, "Event Classifications" and is further described in the Precautions and Limitations section of this procedure to caution users. The EAL Technical Basis Document is not intended to be used in lieu of Emergency Plan Implementing Procedures when classifying emergency events. We do feel, however, that this document will be a valuable tool for our emergency response staff during training and during times when clarification of initiating conditions (time permitting) may be warranted. We have also provided copies of the Technical Basis document to our State and County agencies.

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If you should have any questions about the changes to EPIP 1.2, "Event Classifications" or the EAL Technical Basis Document, please contact Mr. Richard Chojnacki, our Emergency Preparedness Coordinator, at (414) 755-6491.

Sincerely,



G. J. Maxfield
Manager - Point Beach Nuclear Plant

cah

Enclosures

- EAL Technical Basis Document
- Letters from the State of Wisconsin, Manitowoc County, and Kewaunee County describing Event Classification changes

cc: Mr. Thomas J. Ploski, Coordinator
Incident Response Center



Tommy G. Thompson
Governor

Gerald Whitburn
Secretary

State of Wisconsin
Department of Health and Social Services

DIVISION OF HEALTH

1 WEST WILSON STREET
P. O. BOX 309
MADISON WI 53701-0309

May 30, 1995

Richard Chojnacki, Coordinator
Emergency Preparedness
Wisconsin Electric Power Co.
Point Beach Nuclear Plant
6610 Nuclear Rd.
Two Rivers, WI 54241

Dear Mr. Chojnacki;

On May 24, 1995, you briefed myself and Garrett Nielsen (DEG) on recent changes to your plant EALs, as written in your Emergency Plan Implementing Procedures, specifically EPIP 1.2. The changes indicated appear logical, and I understand and concur with the reasoning behind them.

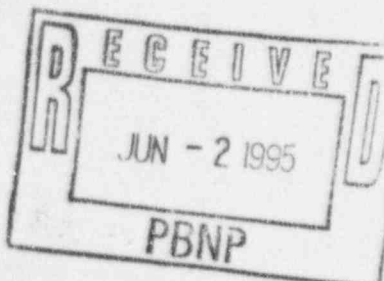
Thank you for the opportunity to review and comment upon this document.

Sincerely,

Paul Schmidt

Paul Schmidt, Manager
Radiation Protection Unit

cc: Garrett Nielsen, DEG





Nancy H. Crowley
Director

Manitowoc County Emergency Government

June 2, 1995

Memo to: Rick Chojnacki

From: Nancy H. Crowley

Subject: • Emergency Action Levels
• Independent Spent Fuel Storage Installation

This memo supports the fact that you and I have discussed EPIP 1.2, "Event Classification", Revision 28 draft dated May 15, 1995 as well as the NRC branch position paper. I believe I understand why the changes were made in EPIP relative to the Emergency Action Levels and have no difficulty with those changes. I will keep the draft copy until I receive the final version.

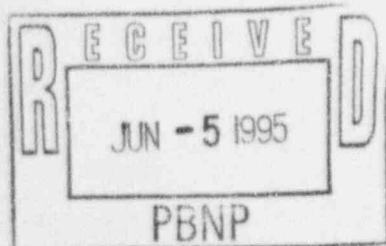
Thanks also for the in-depth explanation of planned relocation of spent fuel at Point Beach Nuclear Plant to the independent spent fuel storage installation. Again I don't object to not having EAL's apply to that facility.

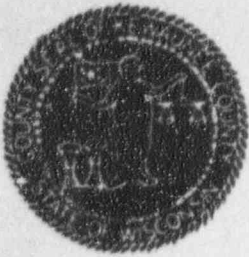
Thank you for your continued effort to keep Manitowoc County emergency management fully apprised of the emergency preparedness philosophy and procedures specific to PBNP.

I spoke with Marcia Smith relative to the purchase of FEMA dosimeters. Marcia said FEMA will require a quarterly drift check on 0-200 mR dosimeters if we purchase their dosimeters. If we purchase the more expensive commercial dosimetry (like those we have ordered) we **will** not be required to do the quarterly drift checks.

NHC:mlh

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KEWAUNEE COUNTY
DIVISION OF
EMERGENCY GOVERNMENT

416 Fremont Street
Algoma, Wisconsin 54201

Lyle E. Schmiling
Director

Telephone (414) 487-2940
Facsimile (414) 487-2963

June 14, 1995

Richard J. Chojnacki, Coordinator
Emergency Preparedness
Point Beach Nuclear Power Plant
6610 Nuclear Road,
Two Rivers, WI 54241

Dear Rick,

This letter is to notify you that after reading your draft document concerning event classifications at Point Beach and having discussed these with you as of May 24, 1995, Kewaunee County Emergency Government has no concerns or comments of your proposed changes.

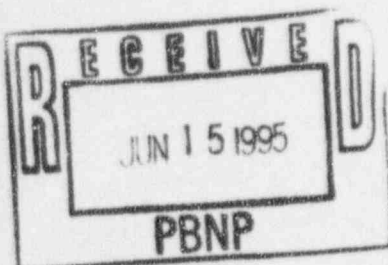
It is a pleasure to work with you and your organization.

If there are any questions or comments, please feel free to call.

Sincerely,

A handwritten signature in cursive script, reading "Lyle E. Schmiling".

Lyle E. Schmiling, Director
Kewaunee County Emergency Government



June 2, 1995

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Washington DC 20555

MANUAL: EAL

CONTROL NO: 13

ISSUE DATE: June 2, 1995

Attached is a new manual, "EAL Technical Basis Document."

**AFTER RECEIVING YOUR MANUAL, PLEASE SIGN AND RETURN TO THE DISTRIBUTION CENTER,
POINT BEACH NUCLEAR PLANT.**

If you have any questions, please call the Distribution Center at Extension 6349, 6386, or 6433.

***** Special Distribution Notes *****

NONE.

Distribution Center - PBNP
G. A. Heusterberg/K. M. Thompson/D. M. Stuebs

Date _____

PUBLIC DOCUMENT ROOM

CONTROLLED

June 2, 1995

To: All Manual Holders
From: Distribution Center - PBNP

Please keep this form with your manual and use it to advise Distribution Center at Point Beach Nuclear Plant in the event the manual issued to you is transferred to another individual. This enables us to route procedure updates more efficiently and assist all manual users in keeping the manuals current. For your convenience a form is attached below which should be completed and sent to Distribution Center - PBNP. Additional forms may be obtained from Distribution Center.

Thank you for your cooperation.

PLEASE PRINT CLEARLY

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Manual: EAL TECHNICAL BASIS DOCUMENT
Controlled
Manual No. 13

The responsibility for updating the above manual has changed. Please remove me from your distribution list and route all future updates to:

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Date effective: _____