

MAY 17 1984

Docket No. 50-266

Docket No. 50-301

Wisconsin Electric Power Company

ATTN: Mr. Sol Burstein

Executive Vice President

Power Plants

231 West Michigan

Milwaukee, WI 53201

Gentlemen:

Thank you for your letters dated March 21 and April 2, 1984, informing us of the steps you have taken to correct the noncompliances which we brought to your attention in Inspection Report Nos. 50-266/83-21 and 50-301/83-20 forwarded by our letter dated February 21, 1984. We appreciate the comprehensive nature of your response which included responses to each of the unresolved items, the weaknesses, and the open items. However, your response to several of the violations require clarification. As discussed during a telephone call on May 1, 1984, between Messrs. J. Zach and R. Link of your staff and Messrs. D. Hunter and I. Jackiw of my staff we understand you will provide the following additional information:

Violation 1.a - Describe the method which assures that only controlled drawings representing current configuration will be used for maintenance and modification work and the interim measures that have been taken to assure that uncontrolled drawings are not being used for those purposes.

Violation 2.c - Describe the training conducted or planned to prevent such oversites by supervisory personnel in the future and implementation dates for completion of the necessary program changes.

Violation 2.e - Provide completion and implementation dates for the necessary program changes.

Violation 5.a - Specify when you will be in compliance.

Violation 5.c - Your response does not address the violation. Clarify when and how audits will be performed and the results of actions taken to correct deficiencies, as required by the technical specifications.

Violation 6.a - Clarify how you assure that the audits of all 18 criteria of 10 CFR 50 Appendix B and the audits required by the technical specifications are performed under the guidance of a certified lead auditor.

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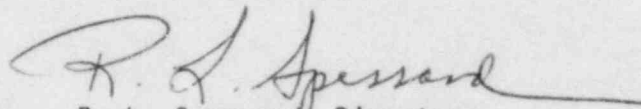
Violation 6.d - Clarify that the audits required by the technical specifications will be conducted in accordance with the requirements of ANSI N45.2.12. Your commitment in Section 1.8 of the FSAR to meet the requirements of Criterion XVIII of 10 CFR 50 Appendix B by implementation of the provisions of ANSI N45.2.12 makes those provisions requirements to the extent that the standard states them as requirements. While we agree that current OSRC practices are good from the standpoint of committee review and overview, they do not meet the audit requirements as specified in the technical specifications and FSAR commitments.

In response to Violation 3 you stated that the Inspection and Enforcement position paper would require a documented safety evaluation per 10 CFR 50.59 for a simple change to an engineering office layout. We direct your attention to Section D.7.d of the 10 CFR 50.59 discussion in part 9800 of the IE Manual (issued January 1, 1984) which specifically notes that such changes do not necessarily require a safety evaluation per 10 CFR 50.59. We agree with your need to provide more detailed guidance and criteria in administrative procedures in order to adequately fulfill the stated objectives of 10 CFR 50.59.

We understand you will provide the additional information to Violations 1.a, 2.c, 2.e, 5.a, 5.c, 6.a and 6.d within 60 days of the receipt of this letter.

Your cooperation with us is appreciated.

Sincerely,



R. L. Spessard, Director
Division of Engineering

cc: J. J. Zach, Plant Manager

cc w/ltrs dtd 03/21/84 & 04/02/84:
DMB/Document Control Desk (RIDS)
Resident Inspector, RIII
John J. Duffy, Chief
Boiler Section
Peter Anderson, Wisconsin's
Environmental Decade
Ness Flores, Chairperson
Wisconsin Public Service
Commission

RIII
mcc for
Hasse/lid
mcc
Choules
04/25/84

RIII
Jordan
Jordan
mcc for
Westberg

RIII
mcc for
Hunter
SS
Streeter
5/17

RIII
Jackiw
Jackiw
Walker
Walker

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Davis
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*For telecon
w/ ABD: ABD
concerned on the
draft.*