



Wisconsin Electric POWER COMPANY
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June 1, 1984

Mr. H. R. Denton, Director
Office of Nuclear Reactor Regulation
U. S. NUCLEAR REGULATORY COMMISSION
Washington, D. C. 20555

Attention: Mr. J. R. Miller, Chief
Operating Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
ADDITIONAL INFORMATION ON GENERIC LETTER 82-33
PROCEDURES GENERATION PACKAGE
UPGRADED EMERGENCY OPERATING PROCEDURES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated April 15, 1983 we provided a description of our plans and a schedule for a phased implementation and integration of our emergency response activities. That information was in response to Mr. D. G. Eisenhower's letter dated December 17, 1982, Generic Letter No. 82-33, "Supplement 1 to NUREG-0737 Requirements for Emergency Response Capability". In the April 15 letter we committed to submitting a procedures generation package which would describe the methods used to upgrade the Point Beach Emergency Operating Procedures (EOP's) by December 11, 1983. This date was later revised to April 1984 and then May 1984 in letters dated August 24, 1983 and March 30, 1984.

This letter contains the procedures generation package which consists of four attachments. Attachment 1 provides a description of how the generic Westinghouse Emergency Response Guidelines (ERG's), Revision 1, are merged with plant-specific requirements to result in the new EOP's. Due to the number of specific items, only one example is included, however, the remainder will be available for review at the plant. Attachment 2 is the Point Beach EOP Writer's Guide. Attachment 3 provides the description and procedures for the EOP verification and validation program. Attachment 4 provides a description of the new EOP training program for licensed plant operators. Each of the attachments is an independent document being used to describe or perform a specific function. These documents are part of a dynamic process and are subject to change as refinements are deemed necessary. The version in use at the time of performing the given function will be documented.

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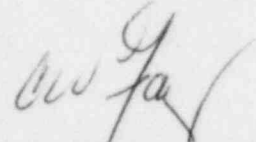
Mr. H. R. Denton

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June 1, 1984

As stated in our March 30 letter concerning upgraded EOP's, we currently intend to implement the new EOP's in January 1985. Should you have any further questions concerning this matter, or the material provided herein, please contact us.

Very truly yours,



Vice President-Nuclear Power

C. W. Fay

Attachments

Copy to NRC Resident Inspector



ATTACHMENT 1

DEVELOPMENT OF THE EMERGENCY OPERATING PROCEDURES

The emergency operating procedure package is currently under development with approximately half of the procedures in draft form. The methodology described herein is generally followed for each procedure. Some of the procedures require more reviews and revisions than others but this description is a typical process.

Wisconsin Electric is using the Emergency Response Guidelines, Revision 1, prepared by the Westinghouse Owners Group as the reference procedure set for preparing plant specific EOPs for Point Beach. The first step is to compare the generic procedures to the in-use plant emergency operating procedures and normal operating procedures to discover analogous procedures. These analogous plant procedures are reviewed to determine which steps are action steps and which are informational. This comparison between the plant and generic procedure is done to determine which items of the plant procedure are not included in the generic procedure but should be retained in the new procedures.

Next is a review of the generic procedure by an experienced Senior Reactor Operator. This is done to determine:

- which items of the generic procedure are not applicable at Point Beach
- which steps have too much or too little detail for our operators
- which aspects of the format are perceived to be difficult or undesirable and how they could be changed
- other similar operational concerns

If the Senior Reactor Operator points out apparent discrepancies between plant hardware and the generic plant, other plant resources are used for additional confirmation. These resources include but are not limited to Point Beach FSAR system descriptions, system drawings, logics, and cognizant personnel. Other plant resources are used to determine plant specific terminology including control room annunciators, control boards, operating procedures and checklists, and personnel.

When an analogous plant emergency or normal operating procedure exists, the Senior Reactor Operator is also asked to go over it and advise what steps should be included in the new emergency operating procedure.

After this information is collected, the plant procedure is written following the guidance of the plant specific writer's guide. This initial typed draft is often reviewed again either by routing to a Senior Reactor Operator or having the procedure writer go over the procedure with the Senior Reactor Operator. If changes are necessary, another draft is typed.

This procedure is then reviewed by a subgroup of the Manager's Supervisory Staff with the procedure writer to discuss areas of improvement. A new draft was typed with these suggestions incorporated. At this time a deviation document is developed. This document describes the differences between the draft plant emergency operating procedure and the generic procedure and provides justification for those differences. This document is to be used as a source document during the verification process to explain deviations and minimize discrepancies that must be resolved. These plant emergency operating procedures will be reviewed by the Manager's Supervisory Staff and approved by the Manager - Point Beach prior to implementation.

The plant specific items are too numerous to send to the NRC but will be available for audit at the plant site. Some examples of typical material prepared or used in the emergency operating procedures writing process are attached. Attachment 1.1 is an example of a plant specific emergency operating procedure, EOP-0, "Reactor Trip Or Safety Injection." Attachment 1.2 is the associated Deviation Document for EOP-0. Attachment 1.3 is E-0, "Reactor Trip Or Safety Injection," the generic reference procedure from which EOP-0 was written. These documents will be referenced by the Verification example given in Attachment 3.