



**Wisconsin
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VPNPD-92-043
NRC-92-067

January 23, 1992

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

Gentlemen:

DOCKETS 50-266 AND 50-301
AMENDED RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORT 50-265/91019 (DRP);
50-301/91019 (DRP)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On October 28, 1991, a Notice of Violation (NOV) was issued with the subject Inspection Report as a result of findings during a routine unannounced safety inspection conducted by the NRC Resident Inspectors. We initially responded to the NOV in a letter dated November 27, 1991. Violation "B" of the NOV addressed scaffolding which was improperly erected in the vicinity of the plant safety injection pumps. This is an amendment to that response.

In our response to this citation, we acknowledged the violation. However, we took issue with the portion of the citation concerning the securing of the planking to the scaffold. Checklist MT-114 requires scaffold planks in safe shutdown areas to be cleated or wired down. During our initial investigation of this event, it was our understanding that checklist MT-114 had been properly completed and that, therefore, the planking was not loose and did not require additional mooring.

After submittal of this response, the issue of securing of the planking was again questioned by our Resident Inspector, Mr. Gadzala. We subsequently investigated this issue more closely. After further discussions with the involved personnel, we now believe that the planking had not been secured to the scaffold structure by cleats or wires. Thus, the description of the state of the scaffold planking in the NOV was correct as stated. As a result of this additional investigation, we acknowledge that our initial response to this violation improperly characterized the

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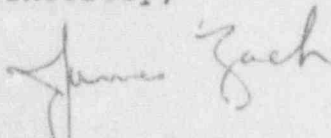
condition of the scaffolding. However, we have concluded that corrective actions committed to in our November 27, 1991, letter regarding this violation remain applicable.

The Inspection Report also cited an additional example of improper construction of a scaffold near the switchgear room bypass alternate shutdown panel. The Inspection Report stated that a scaffold had been erected in a safe shutdown area but the area was not delineated as such on the maps included in PBNP 3.4.8, "Transient Combustible Control." The report also stated that PBNP 3.4.8 appeared somewhat ambiguous in its description of safe shutdown areas.

In response to this concern, PBNP 3.4.8 has been revised (Revision 9, to be issued in January 1992) to clarify the above ambiguities. The definition of safe shutdown area has been changed to include only those identified fire zones which contain or expose systems, components, or cables that, if damaged by fire, would require the use of an alternate system or component to achieve plant cold shutdown in accordance with Appendix R requirements. Using this clarification, the switchgear room bypass alternate shutdown panel has been determined not to be located in a safe shutdown area and will not be delineated as such on the figures of PBNP 3.4.8. In addition, the figures highlighting the safe shutdown areas remain unchanged from Revision 8 (issued November 3, 1989). However, the method of delineating the safe shutdown areas on the figures will be referenced in the text of the procedure to clarify the ambiguity indicated in the Inspection Report.

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

Sincerely,



James J. Zach
Vice President
Nuclear Power

Copies to NRC Regional Administrator, Region III
NRC Resident Inspector