#### U. S. NUCLEAR REGULATORY COMMISSION

#### REGION III

Reports No. 50-266/84-11; 50-301/84-09

Docket Nos. 50-263; 50-301

Licenses No. DPR-24; DPR-27

Licensee: Wisconsin Electric Power Company

231 West Michigan Milwaukee, WI 53203

Facility Name: Point Beach Nuclear Power Plant, Units 1 and 2

Inspection At: Point Beach site, Two Rivers, WI

Inspection Conducted: July 2-3, 1984

Guldemond Guldemond

Approved By: W. G. Guldemond, Chief

Operationa! Programs Section

7/27/84

# Inspection Summary

Inspection on July 2-3, 1984 (Reports No. 50-266/84-11 and 50-301/84-09 Areas Inspected: Routine, announced inspection of licensee's follow-up action of previously identified inspection findings. The inspection involved 22 inspector-hours onsite by two NRC inspectors including U inspector-hours onsite during off-shifts. Results: No items of noncompliance or deviations were identified.

## DETAILS

## Persons Contacted

## a. Licensee Employees

\*J. J. Zach, Manager, PBNP

\*G. J. Mafield, Superintendent, Operations

\*R. E. Link, Superintendent, Engineering Quality and Regulatory Affairs

\*P. Glessner, Fire Protection Supervisor

M. Logan, Quality Engineer

\*F. A. Flentje, Staff Services Supervisor

M. Kaminski, Wisconsin Electric System Fire Protection Officer

## b. NRC Representatives

\*R. L. Hague, Senior Resident Inspector

\*B. E. Fitzpatrick, Resident Inspector

\*Denotes personnel present at the exit interview.

## 2. Licensee Action on Previous Inspection Findings

(CLOSED) Open Items (50-266/82-07-01 and 50-301/82-07-01): These items documented the fact that station startup physics test procedures did not contain or reference acceptance criteria or applicable Technical Specification requirements. Review of startup test procedures WMTP3.1, Revision 3, and WMTP3.2, Revision 7, confirmed that applicable acceptance criteria and technical specification requirements have been specified in the subject documents.

(CLOSED) Noncompliance Items (50-266/82-17-01 and 50-301/82-17-01): These items documented a failure on the part of the licensee to incorporate applicable requirements into test procedures for fire pumps, alarm systems, and fire signalling systems. The appropriate requirements were verified to have been incorporated in the following surveillance procedures: T.S. 72, Revision 0; T.S. 7, Revision 9; T.S. 16, Revision 16; T.S. 13, Revision 10; T.S. 20, Revision 3; and T.S. 25, Revision 3.

(CLOSED) Noncompliance Items (50-266/82-17-02 and 50-301/82-17-02): These items documented a failure on the part of the licensee to control the status of a safe shutdown area fire door. The licensee has installed computer supervised alarms on all such doors.

(CLOSED) Unresolved Items (50-266/82-17-03 and 50-301/82-17-03): These items concerned fusible links on fire doors' automatic closure devices which had been painted, impeding automatic closing of fire doors. The following action has been taken by the licensee to resolve these items:

- a. Fusible links have been removed from all safe shutdown area fire doors thereby defeating the hold-open feature. This was verified by inspection of a number of doors.
- b. The licensee is conducting semiannual inspections of all safe shutdown area fire doors to assure that fusible links have not been inadvertently replaced per Procedure PC-70, Revision 3, Part 1.
- c. The licensee is conducting annual inspections of all industrial safety fire doors for unsatisfactory fusible links and replacing those links with operable links per Procedure PC-70, Revision 3, Part 2.

(CLOSED) Unresolved Items (50-266/82-17-04 and 50-301/82-17-04): These items documented concern that the fire resistance rating of fire doors may have been degraded when modifications were made to fire doors, such as attaching labels, after the integrity of the fire resistance rating of these doors was established by the manufacturer. All such modifications must be accomplished in accordance with manufacture's installation instructions. Representatives of the manufacturer of the fire doors and Underwriters Laboratories (U. L.) inspected the subject doors and provided documentation that the modified doors are acceptable. The inspectors reviewed documentation supporting U. L. and vendor inspections and confirming the conclusions that fire door resistivity was not compromised.

(CLOSED) Unresolved Items (50-266/82-17-05 and 50-301/82-17-05): These items documented the fact that two fire doors that appeared to be the same model had different labelled fire hour ratings. One door was labeled as a 1-½ hour fire door and the second door was labeled as a 3 hour fire door. A 1-½ nour fire door installed in an opening requiring a 3 hour fire door would not be acceptable. The licensee provided vendor documentation that all subject fire doors are manufactured to a 3 hour fire rating and that the door labels are installed to satisfy purchase specification requirements.

(CLOSED) Unresolved Items (50 265/82-17-06 and 50-301/82-17-06): These items documented a concern that the combination dual purpose fire doors/bullet resistant doors installed in plant safety related areas were labeled as "Bullet Resisting Fire Doors." Such a category does not exist in the U. L. building materials directory. The manufacturer of these doors has provided documentation certifying U. L. listing of these dual purpose doors. This documentation was reviewed by the inspectors and found acceptable.

(CLOSED) Noncompliance Items (50-266/82-17-07 and 50-301/82-17-07): These items documented 10 specific areas where the licensee failed to implement their fire protection program including inadequate contractor training, flammable material spill/leak response training, combustible control tours, combustible controls, work review for fire hazards, hot work authorization, fire fighting strategies, valve position control, offsite fire department drills, and fire brigade training. The inspection showed that the licensee had taken appropriate corrective actions in all areas of concern. Specifically, the initial

indoctrination training program was expanded to include necessary information on fire protection including administrative procedures for combustible control, transient fire loadings, and ignition permit authorization, as well as additional information on handling spills/leaks of flammable materials. Administrative Procedure PC-71, Revision 2 was implemented requiring weekly documented shift supervisor combustible control/housekeeping tours. Administrative Procedure PBNP 3.4.8, Revision 4 was implemented establishing additional controls on transient combustibles. Supervisory and management personnel now receive annual training on this procedure. A review block was added to the maintenance request form for the work group supervisor to establish combustible controls for maintenance in safe shutdown areas. Hot work authorization is controlled through the ignition control permit system. The licensee maintains an approved list of those personnel who have received the requisite training to qualify them for issuance of ignition control permits. Area specific fire fighting strategies, FEP 4.0-4.25, have been developed and implemented. Surveillance TS-23 has been revised and now requires valve position verification checks on all critical valves in the fire protection system. Offsite fire department training has been made current and is being tracked by computer as is all facets of fire protection training including that required of fire brigade members.

(CLOSED) Unresolved Item (50-266/82-17-08): This item documented concerns relative to the scope of fire protection audits and the qualifications of fire protection auditors. The inspector reviewed the scope and contents of an audit conducted between December 5 and December 15, 1983 and the qualifications of the auditing personnel. This review showed that the audit was both detailed and comprehensive. The audit team consisted of a lead auditor qualified representative from the licensee's Quality Assurance Department and a qualified fire protection engineer. The licensee has established audit requirements to ensure future audits are conducted in a fashion similar to the December 1983 audit described above. Audit findings will be tracked to resolution by the licensees Quality Assurance Department and the fire protection organization.

(CLOSED) Unresolved Items (50-266/82-17-09 and 50-301/82-17-09): These items documented an apparent discrepancy between the nozzles installed on control room pressurized water fire extinguishers and those committed to in a January 13, 1978 submittal to the NRC. It was subsequently determined by the licensee that no U. L. approved nozzles of the type committed to were commercially available. The licensee has rescinded their commitment. Further, the licensee has conducted training of plant personnel on the precautions necessary when using pressurized water fire extinguishers on energized electrical equipment.

(CLOSED) Unresolved Items (50-266/78-10-01 and 50-301/78-13-01): These items address an apparent lack of Technical Specification requirements to perform acceleration testing of snubbers. Technical Specification amendments 59 and 64 incorporated acceleration testing requirements. These requirements have, in turn, been incorporated into Procedure PT-R2.

(CLOSED) Unresolved Items (50-266/82-14-01 and 50-301/82-14-01): These items document an apparent deficiency in training records documentation for personnel serving a quality assurance function. The licensee currently maintains up-to-date records on such individuals including information on both experience and education.

(CLOSED) Noncompliance Items (50-266/83-21-09 and 50-301/83-20-09): These items documented a failure on the part of the licensee to adequately store maintenance request and surveillance test records. These records are now being microfilmed and stored in both control files and the fire rated vault. This is acceptable.

(CLOSED) Noncompliance Items (50-266/83-21-08E and 50-301/83-20-08E): These items documented a failure on the part of the licensee to establish requirements to perform an evaluation of the uses of measuring and test equipment when such equipment is found out of calibration. Such requirements were verified to have been incorporated into Procedure PBNP 5.5, Revision 2, "Control of Measuring and Test Equipment."

(CLOSED) Unresolved Items (50-266/83-21-15, 50-266/83-21-16, 50-301/83-20-15, and 50-301/83-20-16): These items documented concerns over the lack of traceability of measuring and test equipment as it relates to calibration of such equipment. The licensee has implemented procedure PBNP 6.1.7, Revision 2, "Calibration and Control of Measuring and Test Equipment" which uniquely identifies and documents calibration of measuring and test equipment.

# 3. Exit Interview

The inspectors met with the licensee personnel denoted in Paragraph 1 at the conclusion of the inspection on July 3, 1984. The inspectors summarized the scope and findings of the inspection and noted that licensee representatives were extremely cooperative at resolving all issues addressed during the inspection. The licensee acknowledged the findings of the inspection.