



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

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VPNPD-95-077

October 5, 1995

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORTS 50-266/95008 (DRP); 50-301/95008 (DRP)  
POINT BEACH NUCLEAR PLANT UNITS 1 AND 2

On September 14, the Nuclear Regulatory Commission forwarded to Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, the results of the routine resident inspection conducted by Messrs. T. Kobetz, A. McMurtray, and others of your office from June 17, 1995, through August 11, 1995. This inspection report included a violation wherein compensatory measures were not implemented for a period of 23 minutes for a protected area intrusion alarm which had not been reset.

We have reviewed this apparent violation and, pursuant to the provisions of 10 CFR 2.201, have prepared a written response of explanation concerning the identified violation. Our written response is included as an attachment to this letter.

We believe the attached reply is responsive to your concerns and fulfills the requirements identified in your September 14, 1995, letter.

If you have any questions or require additional information regarding this response, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bob Link'.

Bob Link  
Vice President  
Nuclear Power

Attachment 9510110003 951005  
PDR ADOCK 05000266  
Q PDR

cc: NRC Resident Inspector  
NRC Administrator, Region III

Handwritten initials 'JEO' in black ink, located in the bottom right corner of the page.

## RESPONSE TO NOTICE OF VIOLATION

WISCONSIN ELECTRIC POWER COMPANY  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2  
DOCKETS 50-266 AND 50-301  
LICENSES DPR-24 AND DPR-27

During a routine safety inspection conducted by Messrs. T. Kobetz, A. McMurtray and others from June 17, 1995, through August 11, 1995, a violation of NRC requirements was identified. The violation was classified as Severity Level IV. Inspection Report Nos. 50-266/95008 (DRP) 50-301/95008 (DRP) and the Notice of Violation transmitted to Wisconsin Electric on September 14, 1995, provide details regarding the violation. We agree that the events and circumstances described in the Notice of Violation are accurately characterized.

In accordance with the instructions provided in the inspection report, our reply to the proposed violation includes: (1) the reason for the violation, or if contested, the basis for disputing the violation; (2) corrective action taken; (3) corrective action to be taken to avoid further violations; and (4) date when full compliance will be achieved.

### VIOLATION

Section 3.F of Amendments 37 and 42 of the Facility Operating Licenses No. DPR-24 and DPR-27 requires the licensee to maintain in effect and fully implement all provisions of the Commission approved Physical Security and Contingency Plans, including amendments and changes made pursuant to the authority of 10 CFR 50.54(p).

Section 2.1, Paragraph 5.0 of the approved Point Beach Security Plan requires an outage of the intrusion alarm zone be monitored by a security compensatory measure.

Contrary to the above, on July 13, 1995, the licensee failed to implement compensatory measures for a period of 23 minutes for a protected area intrusion alarm zone that was not functioning, (266/301-95008-02 (DRSS)).

RESPONSE TO VIOLATION:

Wisconsin Electric submitted 30-day security event report 266/95-S03-00 to the NRC on August 11, 1995 as required by 10 CFR 73.71(b). This report was submitted via our transmittal letter VPND 95-066. In that report we provided details of the event, our immediate corrective actions, and long-term corrective actions.

1. Reason for Violation

A comprehensive root cause evaluation of this event and of the previous events determined that corrective actions previously taken were not sufficient to prevent recurrence of this type of event.

Previous event evaluations identified human error and/or noncompliance with procedural guidance as the root cause of the events. The corrective actions focused upon individual performance, written instructions and software solutions rather than upon interface communications and central alarm station (CAS)/secondary alarm station (SAS) facility operations.

The results of the root cause evaluation for this event concluded that communications between the CAS and SAS operators were inadequate in that repeat-back communications were not used.

2. Corrective Actions Taken and Results Achieved:

- a. A comprehensive root cause evaluation of this event and previous similar events was performed. In addition to evaluating the effectiveness of previous corrective actions, an independent evaluation of human engineering/ergonomic aspects of working in the CAS/SAS was conducted.
- b. A preliminary evaluation of CAS/SAS operator distractions resulted in the following corrective actions being taken:
  - (1) Non-essential radios in the CAS/SAS were removed.
  - (2) Ringdown of the security office telephone to the CAS has been discontinued.

3. Corrective Actions to be Taken to Avoid Further Violations

- a. The communications standard will be enhanced and reinforced with CAS/SAS operators by October 30, 1995, to require repeat-backs for CAS/SAS operator communications. Supervision will monitor adherence to this standard and to operator performance and will provide feedback as appropriate.
- b. CAS/SAS operations will be reevaluated by February 28, 1996. Improvements resulting from this reevaluation will be implemented as necessary.

4. Date that Full Compliance will be Achieved:

Full compliance with all regulatory requirements was achieved on July 13, 1995.