

Appendix A

NOTICE OF VIOLATIONS

Wisconsin Electric Power Company  
Point Beach Nuclear Plant

Docket No. 50-266; 50-301

As a result of the inspection conducted on July 23-27, 1984, and in accordance with the General Policy and Procedures for NRC Enforcement Actions, (10 CFR Part 2, Appendix C), the following violations were identified:

1. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). 10 CFR Part 50, Appendix E, Paragraph IV.B. states that emergency action levels shall be discussed and agreed on by the applicant and State and local governmental authorities and reviewed with State and local governmental authorities on an annual basis.

Contrary to the above, emergency action levels for the Point Beach Nuclear Plant had last been reviewed by the State of Wisconsin in November 1982.

This is a Severity Level V violation (Supplement VIII).

2. 10 CFR 50.54(q) requires that nuclear power reactor licensees follow and maintain in effect emergency plans which meet the requirements of Appendix E to 10 CFR Part 50 and the planning standards of 50.47(b). Section IV.B of Appendix E requires that a licensee's emergency plans shall include information to demonstrate compliance with the following:

The means for determining the magnitude and for continually assessing the impact of the release of radioactive material shall be described, including emergency action levels that are to be used as criteria for notification and participation of local and State agencies, the Commission, and other Federal agencies, and the emergency action levels that are to be used for determining when and what type of protective measures should be considered within and outside the site boundary to protect health and safety.

Section 5.0 of Chapter 6.0 of the Point Beach Nuclear Plant Emergency Plan states in part that recommendations for offsite protective actions will be made only by the Emergency Support Manager, but that the Shift Superintendent will have the responsibility and authority of the Emergency Support Manager at the beginning of an emergency evolution.

Contrary to the above, Shift Superintendents, who have the initial responsibility and authority of the Emergency Support Manager to make offsite protective action recommendations, were incapable of determining when and what type of protective measures should be considered outside the site boundary to protect public health and safety.

## Appendix

This is a Severity Level IV violation (Supplement VIII).

3. 10 CFR 50.54(t) requires that nuclear power reactor licensees review their emergency preparedness program at least every 12 months. The review shall include an evaluation for adequacy of interfaces with State and local governments.

Contrary to the above, the licensee did not include an evaluation for adequacy of interfaces with the State and local governments in the 1984 annual audit.

This is a Severity Level IV violation (Supplement VIII).

Pursuant to the provisions of 10 CFR 2.201, you are required to submit to this office within thirty days of the date of this Notice a written statement or explanation in reply, including for each item of noncompliance: (1) corrective action taken and the results achieved; (2) corrective action to be taken to avoid further noncompliance; and (3) the date when full compliance will be achieved. Consideration may be given to extending your response time for good cause shown.

8/21/84

Dated \_\_\_\_\_

*C.J. Paperiello*

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C.J. Paperiello, Chief  
Emergency Preparedness and  
Radiological Protection Branch

## Appendix B

### WEAKNESSES IN THE EMERGENCY PREPAREDNESS PROGRAM

1. A review should be made of the EALs (Appendix B of the Emergency Plan), adding newly installed instrumentation as indicators for event classification, adding core melt sequences that can lead to a General Emergency, and addressing security threats as classifiable events. (Open Item No. 266/84-13-04, 301/84-11-04) (Section 2.0)
2. A comprehensive review should be made of the EIPs to find and correct errors and inconsistencies that make it difficult for personnel to follow the procedures to implement their assigned duties and responsibilities. (Open Item No. 266/84-13-05, 301/84-11-05) (Section 3.0)
3. The conducting of semi-annual shift augmentation drills should be specified in the Emergency Plan. (Open Item No. 266/84-13-07, 301/84-11-07) (Section 6.0)
4. An updated Letter of Agreement is needed from the Doctors Clinic, Ltd. (Open Item No. 266/84-13-08, 301/84-11-08) (Section 10.a)
5. The Emergency Plan needs to be revised to indicate the personnel that are to be augmented in an emergency within 30 and 60 minutes. (Open Item No. 266/84-13-09, 301/84-11-09) (Section 10.b)
6. The Emergency Plan and EIPs should indicate that non-essential personnel will be evacuated at a Site Area or General Emergency unless radiological, environmental, or security conditions prohibit it. (Open Item No. 266/84-13-10, 301/84-11-10) (Section 10.g)