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VPNPD-92-267
NRC-92-083

July 29, 1992

Mr. A. Bert Davis, Regional Administrator
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Davis:

DOCKETS 50-266 AND 50-301
REVISED COMPLETION DATE
IDENTIFICATION OF POST-ACCIDENT
MONITORING INSTRUMENTATION
REGULATORY GUIDE 1.97 IMPLEMENTATION
INSPECTION REPORTS 50-266/91010;50-301/91010
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter of June 4, 1991, transmitted the subject inspection report which identified three open items associated with the implementation of Regulatory Guide 1.97, "Instrumentation for Light-Water-Cooled Nuclear Power Plants to Assess Plant and Environs Conditions During and Following an Accident," Revision 2. Our letter dated July 5, 1991, addressed these open items and delineated expected completion dates for identified corrective actions.

Open Item 50-266/91010-03(DRS);50-301/91010-03(DRS), "Unique Identification of Instruments on Control Panels," stated that Category 1 and 2, Type A, B, and C instruments were not uniquely identified in our control room as recommended by Regulatory Guide 1.97, Revision 2. In our response to this open item, we agreed to uniquely identify main control board Category 1 and 2, Type A, B, and C indicators intended for use under accident conditions for those cases where it was necessary to distinguish indicators because all instrumentation for a particular variable did not meet our Regulatory Guide 1.97 requirements. This commitment was intended to prevent shift operating personnel from monitoring main control board indicators for non-qualified instrumentation when there is Regulatory Guide 1.97 qualified, more reliable instrumentation available to be monitored during accident conditions. In our July 5, 1991, letter, we stated that we would complete the identification and labelling of appropriate indicators by Jul, 1992. We have recently determined that this

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Corrective action will not be completed in July 1992 as originally expected. We will not complete all of the action items required to resolve this open item until September 30, 1992.

Subsequent to our July 5, 1991, response, we determined that in order to continue to promote credibility of control board indications to shift operating personnel, labels would be placed on the indicators of non-qualified instrumentation to distinguish them from those that have duplicate, qualified Regulatory Guide 1.97 indication. These labels would provide an indication to shift operating personnel not to utilize or monitor the non-qualified indicators during emergency operating procedure or accident conditions. Regulatory Guide 1.97 qualified control board indicators will not be labelled. With this understanding regarding the labelling distinction between indicators for qualified and non-qualified instrumentation, the operators would be assured of appropriately monitoring the corresponding indicators of environmentally qualified Regulatory Guide 1.97 instrumentation for the specific variables during emergency operating procedure or accident conditions.

In June 1991, we identified thirteen non-qualified instruments per unit as having duplicate, qualified indication on the main control boards. In August 1991, we surveyed other utilities (via Nuclear Network) regarding how they satisfied the above requirement. In February 1992, we compiled their responses and decided to label only the indicators of non-qualified instrumentation with duplicate Regulatory Guide 1.97 indication. At that time, a label design was proposed and label material was researched. In May 1992, labels were ordered and plant personnel began a review of potentially affected procedures. We received the labels in mid-June 1992, and label installation commenced on July 10, 1992. Currently, we have installed labels on five of the thirteen (per unit) instrument indicators.

During our review of the plant Emergency Operating Procedures (EOPs) and related Critical Safety Procedures (CSPs), we determined that before labels could be placed on the remaining indicators (which include eight [per unit] non-qualified neutron flux instruments), EOP status tree ST-1, "Subcriticality," Critical Safety Procedure CSP S.2, "Response to Loss of Core Shutdown" and related plant process computer displays should be modified to be brought in congruence with the labelling scheme. If not revised, the procedures and computer displays would reference indicators that should not be monitored during accident conditions and potentially confuse shift operating personnel. In planning for implementation of the action items, we did not

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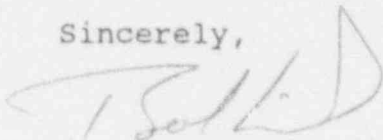
anticipate the scope of the procedure and computer display revisions which we have determined are required.

We identified the potential for not meeting our original July 1992 expected completion date on July 10, 1992, during initial label application. Discussions followed regarding compensatory measures which could be taken to complete all label installation by July 31, 1992. On July 24, 1992, we concluded that quality should not be compromised to meet our original due date and, therefore, decided it was necessary to complete all identified procedure and computer display revisions prior to affixing the remaining eight labels (per unit) on the non-qualified neutron flux instrument indicators.

We anticipate the identified procedure revisions and software modifications will require an additional two months for completion. Therefore, we do not expect to complete all required actions to resolve this open item until September 30, 1992.

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

Sincerely,



Bob Link
Vice President
Nuclear Power

Copies to NRC Document Control Desk
NRC Resident Inspector