March 11, 1985

Mr. H. R. Denton, Director Office of Nuclear Reactor Regulation U. S. NUCLEAR REGULATORY COMMISSION Washington, D. C. 20555

Attention: Mr. J. R. Miller, Chief

Operating Reactors, Branch 3

Gentlemen:

DOCKET NOS. 50-266 AND 50-301
ADDITIONAL RESPONSE TO GENERIC LETTER 82-33
SUPPLEMENT NO. 1 TO NUREG-0737
REQUIREMENTS FOR EMERGENCY RESPONSE CAPABILITY
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

On January 10, 1985 we received your letter dated January 4, 1985 which addressed your initial review of our September 1, 1983 response to Generic Letter 82-33 with regard to conformance to Regulatory Guide 1.97 Revision 2 criteria for the Point Beach Nuclear Plant. An interim report concerning your evaluation of our submittal was provided. You requested that we review this interim report and respond to the open items listed therein within 60 days of our receipt of the letter.

Although we have studied the report in some depth, we are unable to provide a thorough evaluation of the report and prepare adequate justifications to support our positions on the open items within this 60-day time frame. In fact, because of involvement of our staff personnel in electrical equipment environmental qualification, outage-related activities, and other previous commitments, including implementation of upgraded plant Emergency Operating Procedures, we will be unable to commit to completing our response to your January 4 letter until August 1, 1985.

Although we discussed with Mr. Colburn of your staff the possibility of a partial response to your request, for example, addressing only those items on which we agree with the NRC position,

Mr. H. R. Denton -2- March 11, 1985 we do not believe this is the best approach. We understand that your technical review staff would also prefer having a single complete response. Accordingly, we hereby request an extension until August 1, 1985 to respond to the concerns identified in your January 4 letter and attached report. Very truly yours, Vice President-Nuclear Power C. W. Fay Copy to NRC Resident Inspector