



Wisconsin Electric POWER COMPANY
231 W. MICHIGAN, P.O. BOX 2046, MILWAUKEE, WI 53201

December 6, 1984

CERTIFIED MAIL

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
UPGRADED EMERGENCY OPERATING PROCEDURES
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter dated October 26, 1984 we notified you that we would be unable to implement the revised Emergency Operating Procedures (EOP's) by the January 31, 1985 date specified in your July 3, 1984 Confirmatory Order. We requested an extension for implementation of the upgraded EOP's to July 1, 1985.

On November 9, 1984 Messrs. Miller and Colburn of your staff called Messrs. Newton and Krause of my staff to discuss the October 26 request. The call concerned additional information regarding the basis for our request and a discussion of items related to the implementation of the EOP's. The NRC requested that we look at and provide additional information in four specific areas. These areas are:

1. The need to modify existing procedures to utilize the new TMI backfit-related instrumentation that will be operational after the first of the year.
2. The need to add interim procedures during the additional time period requested.
3. A discussion of what is being done to speed up the verification and validation process so that the procedures could be implemented earlier than the requested July 1 date.
4. If the NRC requires that we meet the January 31 date, a discussion of what potential harm could result from meeting that date.

8412110249 841206
PDR ADOCK 05000266
F PDR

-1-

Rec'd W/ATK 1/150.00

A045
/0

We anticipated a follow-up conference call on November 15, 1984 to discuss these four items. However, because of unrelated priority conflicts and personnel scheduling problems, this call was not completed until November 29, 1984. As discussed in these calls, we are providing the following discussion of these four items:

1. Modify existing procedures. The existing procedures, including interim procedures already in use at Point Beach, utilize most of the parameters covered by the new instrumentation. For example, the procedures refer to the use of hydrogen concentration to aid in the decision to vent the head. Existing procedures provide reference to subcooling monitors and containment sump level. Wide-range pressure is also being used in the existing procedures. In addition to instrumentation references, the existing procedures have already been modified for such things as natural circulation steps in the LOCA procedure, including limiting of cooldown to less than 25°F. Procedures also include requirements for manual reactor coolant pump termination and safety injection termination and reinitiation criteria. Therefore, we believe it is not necessary to significantly modify the existing procedures. What can be done is that the existing permanent and interim procedures can be reviewed and where the new instrumentation can be used in the place of old, the procedure will be examined and revised as necessary to ensure that the new instrumentation is properly referenced and that the operator is aware that he should use the new instrumentation.
2. Addition of interim procedures. The need for additional interim procedures was reviewed by examining the existing set of emergency procedures and already existing interim procedures. As discussed above, the plant staff is already using some interim procedures to address the key TMI concerns. Examples of these procedures already in use are the procedure for loss of all AC power and the procedure for reactor vessel head vent. Steps have been added to the LOCA procedure that address aspects of inadequate core cooling. We believe that no additional interim procedures are needed before the new EOP's are implemented.
3. Speeding up the verification/validation process. The verification process started in May 1984. It was not until mid-July that the participants had developed a consistent method for procedure verification. It was another month, until August, before they felt they could

perform independent reviews and still be somewhat uniform in their verification methods and procedures. Starting in September each member was assigned different procedures to perform the initial verification. However, the committee as a whole still must meet to review each discrepancy the verification team members identify. It was not until this process had progressed to a point where the rate of verification could be estimated that we could reasonably determine how much additional time would be necessary to implement the EOP's. The estimation was then made in October that the effort could not be completed in time to implement procedures by the end of January 1985. At that time the request for delay was sent to the NRC. To further speed up the verification process, outside consultant help has been contracted for to assist in the preparation of background material and in the verification process itself if needed. It is expected that this additional help will speed up the process by about one month. A major factor that contributes to the length of time for proper verification is the requirement for proper documentation of the process. Proper verification cannot be performed without detailed documentation recording the process. Before the EOP's can be implemented it will be necessary to make sure that all of the verification discrepancies have been satisfactorily resolved and so noted on the documentation. As mentioned during our November 9 telephone call, we have already had all members of the verification team on some overtime hours. Because of the training time involved to understand the procedure writer's guide and verification process and the experience and qualification levels necessary in the personnel performing this process, it is not realistic to expect to speed up the process appreciably by assigning more company personnel.

4. Potential harm of implementation "as is" by January 1985. If the process is speeded up and the procedures are implemented without proper verification, there exists some probability that incorrect steps will exist in the procedures. If the verification were to be done after procedure implementation, it would result in additional changes to the procedures and confusion among the plant operators as to the quality and reliability of the procedures themselves. Repeated procedural changes after implementation would also necessitate repeated retraining of the operators and subsequent additional inefficient utilization of training time and resources. It is our judgment that it is better to take additional time to perform the verification correctly and then implement the properly verified procedures.

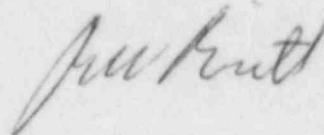
Mr. H. R. Denton

-4-

December 6, 1984

We will make every attempt to speed up the process within the above constraints and complete the verification and implement the Emergency Operating Procedures at the earliest practicable date. As discussed with your staff during the telephone call on November 29, we understand this request for approval of a schedule extension is subject to the application fee of 10 CFR 170.12(c). Accordingly, enclosed is a check in the amount of \$150 covering this approval fee.

Very truly yours,



President

R. W. Britt

Copy to NRC Resident Inspector

Enclosure (Check No. 819844)

