

JUL 8 1992

Docket No. 50-266  
Docket No. 50-301

Wisconsin Electric Power Company  
ATTN: Mr. Robert E. Link  
Vice President  
Nuclear Power  
231 West Michigan Street-P379  
Milwaukee, WI 53201

Dear Mr. Link:

SUBJECT: NOTICE OF VIOLATION (NRC INSPECTION REPORTS NO.  
50-266/92008(DRS); 50-301/92008(DRS))

This will acknowledge receipt of your letters dated June 26, 1992, in response to our letter dated May 28, 1992, transmitting Notices of Violation and Deviation associated with Inspection Reports No. 50-266/92008(DRS) and 50-301/92008(DRS). These reports summarize the results of our inspection of your inservice testing activities at your Point Beach Nuclear Plant, Units 1 and 2. We have reviewed your corrective actions and have no further questions at this time. These corrective actions will be examined during future inspections.

Sincerely,

ORIGINAL SIGNED BY ROBERT J. MILLER

H. J. Miller, Director  
Division of Reactor Safety

Enclosure: Letters dated  
June 26, 1992

See Attached Distribution

RIII <i>[Signature]</i> Smith/jk 07/08/92	RIII <i>[Signature]</i> Jacobson 07/08/92	RIII <i>[Signature]</i> Jackiw 07/08/92	<sup>yes</sup> RIII <i>[Signature]</i> Ring 07/08/92	RIII <i>[Signature]</i> Martin 07/08/92	RIII <i>[Signature]</i> Miller 07/08/92
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Distribution

cc w/enclosure:

G. J. Masfield, Plant Manager

DCD/DCB (RIDS)

OC/LFDCB

Resident Inspector, RIII

Virgil Kanable, Chief

Boiler Section

Charles Thompson, Chairman

Wisconsin Public Service

Commission

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231 W Michigan, PO. Box 2046, Milwaukee, WI 53201

(615) 221-2345

VPNPD-92-229  
NRC-92-068

June 26, 1992

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
RESPONSE TO NOTICE OF DEVIATION  
INSPECTION REPORT 50-266/92008(DRS);  
50-301/92008(DRS)  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated May 28, 1992, transmitted a Notice of Deviation which was supported by the findings documented in Inspection Report 50-266/92008(DRS); 50-301/92008(DRS). Your report indicated that during the NRC inspection conducted April 20 through 24, 1992, a deviation from a commitment contained in our January 16, 1991, response to Generic Letter 89-04 was identified. We had committed to revising In-Service Test (IST) Procedures to include a sign-off to document operability determinations. The Notice of Deviation stated that, contrary to our commitment, as of April 24, 1992, some of our IST procedures had not been revised to include immediate operability sign-offs.

The subject procedures deal with testing of components during plant conditions when the equipment is not required to be operable (i.e., cold shutdown). Thus, when these procedures were reviewed in response to Position 8 of GL 89-04, the addition of an immediate check of equipment operability following testing was not considered to be warranted because this equipment was not required to be immediately operable. A 96-hour post-test data analysis for test on this equipment in the plant shutdown condition was considered adequate. Requirements for a standard 96-hour post-test data analysis and operability determination are included in each IST procedure as required by ASME Section XI, Rules for In-Service Inspection of Nuclear Power Plant Components."

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June 26, 1992  
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We now acknowledge that the omission of these immediate operability sign-off steps in the subject procedures represents a deviation from our previous commitment. We, therefore, will revise the procedures in question to add the immediate operability sign-off as previously committed. Additionally, we will conduct a review of all other IST procedures to ensure that they all include such a sign-off. Both of these actions will be completed by September 18, 1992.

Upon completion of the corrective actions described in this response to the Notice of Deviation, we will be in conformance with our commitment.

Please note that the Notice of Deviation incorrectly identified that the subject commitment had been made in our January 16, 1991, letter. The record should show that this commitment was actually made in our letter dated October 3, 1989, in which we responded to Generic Letter 89-04.

Please contact us should you require additional information or have questions regarding this response.

Sincerely,



Bob Link  
Vice President  
Nuclear Power

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector



Wisconsin  
Electric  
POWER COMPANY

231 W Michigan, PO Box 2046, Milwaukee, WI 53201

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VPNPD-92-228  
NRC-92-067

June 26, 1992

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

Gentlemen:

DOCKETS 50-266 AND 50-301  
RESPONSE TO NOTICE OF VIOLATION  
INSPECTION REPORT 50-266/92008(DRS);  
50-301/92008(DRS)  
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

Your letter dated May 28, 1992, transmitted a Notice of Violation which was supported by the findings documented in Inspection Report 50-266/92008(DRS); 50-266/92008(DRS). The Notice of Violation cited two violations, both related to the Point Beach Nuclear Plant (PBNP) In-Service Test (IST) Program. Both violations were characterized as Severity Level IV.

Response to Violation 1

The first violation cited nonconformance with 10 CFR 50.55a. (g)(4)(ii), which requires that in-service tests comply with the ASME Code. Specifically, ASME Code Section XI, "Rules for In-Service Inspection of Nuclear Power Plant Components;" Article IWP-3230, "Corrective Action;" Section (b) requires that pumps be declared inoperable if deviations fall within the "required action range." Contrary to the ASME Code requirements, on January 6, 1992, a review of IST data for Service Water (SW) pumps P-32E and P-32F indicated that the pumps were within the "required action range" for high differential pressure; however the pumps were not declared inoperable.

Due to recalibration of instrumentation used in the service water pump in-service test, a new set of acceptance criteria had been entered into our operations computer database which is used to assist personnel in performing the 96-hour review required by ASME, Section IX, IWP-3220, "Time Allowed for Analysis of Tests."

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However, PBNP 4.12.17, "Operations Standing Order on In-Service Testing," which is the document used by control room personnel to perform immediate equipment operability determinations, was not issued with the updated acceptance criteria until after the January 3, 1992, testing had been completed.

On January 3, 1992, when IT-7, "Service Water Pumps and Valves," was conducted, the differential pressure results for the subject SW pumps were within the limits specified in PBNP 4.12.17; consequently, the pumps were considered operable by control room personnel during the immediate operability determination. During the 96-hour review, however, it was determined that the SW pumps' differential pressure was not within the acceptance criteria contained in the operations computer program and that the pumps were within the "required action range." Operations staff personnel recognized the discrepancy between the two sets of acceptance criteria but did not inform control room personnel of the pending change to PBNP 4.12.17 which had not yet been issued. Consequently, the SW pumps were not declared inoperable as required by the ASME code. Updated acceptance criteria were issued in PBNP 4.12.17 on January 24, 1992, which brought this set of acceptance criteria into agreement with the operations computer database.

High pump differential pressures are not typically indicative of pump degradation; instead, high pump differential pressures normally indicate instrumentation or system alignment problems. Consequently, although the high pump differential pressure test results should have resulted in a declaration of inoperability, the pumps were still capable of performing their intended functions.

When the required second quarter IT-7 for these pumps was conducted in April 1992, the operability of the pumps was verified. PBNP 4.12.17 and the operations computer program were both revised in April 1992 to reflect new pump differential pressure acceptance criteria.

Our IST Administrative Control Procedure PBNP 3.2.10, "In-Service Testing (Pump and Valve) Integrated Administrative Control Program at PBNP," describes the various documents and computer software which comprise the IST program. This procedure does not, however, provide specific guidance on the use or maintenance of these IST program components. To prevent recurrence of the acceptance criteria discrepancies, we are revising PBNP 3.2.10 so that IST Program responsibilities are delineated for all personnel involved with the IST Program. Specifically, controls will be added to ensure that future revisions to acceptance criteria are properly updated in both PBNP 4.12.17 and in the operations computer program. Additionally, a statement will be added to ensure that, if a

discrepancy is found between acceptance criteria contained in PBNP 4.12.17 and in the operations computer program, the discrepancy will be resolved prior to completing the 96-hour operability determination. We expect that these procedure changes will result in adequate assessment of test results and will ensure timely management reconciliation of identified discrepancies. This revision to PBFP 3.2.10 will be issued by August 14, 1992.

### Response to Violation 2

The second violation cited nonconformance with 10 CFR 50, Appendix B, Criterion III, "Design Control," which requires that acceptance criteria for inspections and tests be subject to approval measures commensurate with those applied by the organization that performed the original design. The Notice of Violations stated that our procedure which contains the PBNP IST acceptance criteria, PBNP 4.12.17, "Operations Standing Order on In-Service Testing," violates this requirement because the procedure was not reviewed by the originating organization and does not require adequate control measures for subsequent changes to acceptance criteria.

PBNP 4.12.17 is currently classified as a Non-Nuclear Safety-Related (NNSR) Procedure and, as such, is not subject to the same stringent revision requirements as Nuclear Safety-Related (NSR) Procedures. NSR procedures are subject to the review procedures contained in 10 CFR 50.59, "Changes, Tests, and Experiments." To ensure appropriate review and control of the acceptance criteria contained in PBNP 4.12.17, this procedure will be reclassified as a Nuclear Safety-Related (NSR) procedure.

Point Beach Technical Specification, 15.6.8, "Plant Operating Procedures," describes the differences between major and minor procedures. Major procedures are supported by appropriate minor procedures (such as data sheets). Each individual In-Service Test (IST) procedure which is performed on plant components is appropriately classified as a major NSR procedure. PBNP 4.12.17 is a supporting document to these IT procedures and will, therefore, be classified as a minor NSR procedure. Classification as a minor NSR procedure requires that all revisions be approved by a supervisor of the cognizant group (i.e., the group assigned ownership of the procedure) and are subsequently reviewed and approved by the cognizant group head. This administrative change will be completed by July 31, 1992.

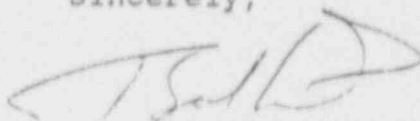
Upon completion of the corrective actions described in this response to this Notice of Violation, we believe we will be in full compliance with the cited requirements.

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In your May 28, 1992, inspection report letter, additional issues were identified as part of an unresolved item. You have requested a response to this item with our evaluation of each issue and, as appropriate, our intended corrective actions. We plan to complete our evaluation of the issues relevant to the unresolved item and will provide you with our response by July 31, 1992.

Please contact us should you require additional information or have questions regarding this response.

Sincerely,



Bob Link  
Vice President  
Nuclear Power

Copies to NRC Regional Administrator, Region III  
NRC Resident Inspector



Region III - RITS System  
Inspection Report Tracking Subsystem (IRTS)  
Data Input/Update Sheet

Instructions: Each record in this database is defined by the Docket Number and Report Number Combination. For each IRTS update, this specific data must be included. Upon completion of this form, please forward it to the Information Management Section (IMS), ATTN: Ida Opre.

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\* Docket Number (1st Unit): 05000266 Report Number: 92-008 \*  
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\* Docket Number (2nd Unit): 05000301 Report Number: 92-008 \*  
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In order to effect changes in the IRTS database, please complete the following field updates, as necessary:

Lead Inspector: J. E. SMITH - - - - -

Type of Inspection: T=Team, S=Salp, (Blank)=Regular

Date Inspection Ended: 05/27/92 (Actual or Projected)

Date Inspection Report Mailed: 05/28/92

Inspection Report Status Code: C C=Closed, (Blank)=Open, X=Cancelled

Licensee Response Required?: Y Y=Yes, (Blank)=No

Date Licensee Response Received: 07/01/92

Special Comments or Instructions: \_\_\_\_\_  
\_\_\_\_\_

Form Completed By: J. R. K...  
for J. F. Smith

Date: 7-8-92