



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

January 24, 1985

Mr. J. G. Keppler, Regional Administrator
Office of Inspection and Enforcement,
Region III
U. S. NUCLEAR REGULATORY COMMISSION
799 Roosevelt Road
Glen Ellyn, Illinois 60137

Dear Mr. Keppler:

DOCKET NOS. 50-266 AND 50-301
RESPONSE TO NRC INSPECTION REPORT
NOS. 50-266/84-18 AND 50-301/84-16
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In response to the subject inspection reports dated December 19, 1984, the following is provided pursuant to 10 CFR 2.201:

1. Inadvertent Actuation of Emergency Safeguards

Licensee Event Report (LER) 84-007-00 (Point Beach Unit 2) was submitted on December 7, 1984 and describes this occurrence. As stated in the LER, the following corrective actions are being taken:

- a. The Duty Shift Superintendents are reviewing the Operations Special Order delineating guidelines for electrical bus switching with their crews to ensure that it is understood by all licensed operators. Completion of these reviews is anticipated by January 20, 1985.
- b. An electrical equipment operating instruction is being developed which will give added assurance that events of this type will not recur in the future. Completion of this item is expected by March 1, 1985.

In addition to the measures mentioned above, a new maintenance work request procedure has been issued and includes two additional reviews to assure that a Special Maintenance Procedure is used when required. This new procedure went into effect on January 7, 1985.

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Apparent Lack of Health Physics Coverage

This event occurred on November 7, 1984 during thimble tube installation work. The seal table area was designated as an area where a radiation work permit (RWP) is required due to the potential for contamination of the table during thimble insertion. The need for direct Health Physics (HP) coverage was stated on the RWP issued for the work. When the work crew was ready to start work in the RWP area, the engineer supervising the thimble installation paged the HP technician who was assigned to cover the job and informed him that work was ready to commence. The engineer then gained access to a work platform located approximately 12 feet above the seal table by a route which did not cause him to enter the seal table pit area. He did not consider his actions to be covered by the RWP based on his understanding that the RWP applied only to work done on the seal table and because of prior experience on similar jobs.

When the HP technician arrived at the job site, he questioned the engineer about his presence on the platform and apparent noncompliance with the RWP requirement for direct HP coverage. Although the engineer still believed the platform was not within the RWP area, he immediately complied with the HP technician's interpretation and the work platform was treated as part of the RWP area for the remainder of the job. Subsequent investigation of the incident concluded that the platform work was covered by the RWP, since the RWP was written to cover the entire thimble installation and not just the seal table work. The Superintendent-Engineering, Quality, and Regulatory Services reviewed this conclusion with the engineer to make sure the engineer understood the reason an RWP was required.

Additional corrective action includes the following:

- a. Unit 1 thimble tube replacement work is planned during the refueling outage scheduled to begin in April 1985. The work done on the work platform during thimble installation will be considered to be under the scope of the RWP unless the RWP explicitly states otherwise.
- b. All Point Beach management personnel will attend Health Physics training sessions in February and March 1985.

Mr. J. G. Keppler

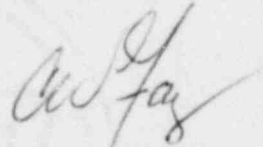
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The purpose of these sessions is to explain HP procedures and emphasize the importance of complying with these procedures.

If you should have any questions concerning the above, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in cursive script, appearing to read "C. W. Fay".

Vice President-Nuclear Power

C. W. Fay

Copy to NRC Resident Inspector