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March 1, 1996

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

Gentlemen:

DOCKETS 50-266 AND 50-301
RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORTS 50-266/95015 (DRP); 50-301/95015 (DRP)
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

In a letter from Mr. M. J. Farber dated February 2, 1996, the Nuclear Regulatory Commission forwarded to Wisconsin Electric Power Company, licensee for the Point Beach Nuclear Plant, the results of a routine safety inspection performed by Messrs. T. Kobetz and A. McMurtray from November 17, 1995, through January 10, 1996. This inspection report included a Notice of Violation (Notice) related to the 10 CFR 50 Appendix B, Criterion V requirement that activities affecting quality be prescribed by procedures appropriate to the circumstances and accomplished in accordance with these procedures. The violation is based on a failure to implement a foreign material exclusion (FME) inspection signoff to document that the inspection had been accomplished in accordance with Point Beach Nuclear Power Procedure NP 8.4.10.

We have reviewed this Notice and, pursuant to the provisions of 10 CFR 2.201, have prepared a written response of explanation concerning the identified violation of a Point Beach procedure. Our written response is included as an attachment to this letter.

We believe that the attached reply is responsive to your concerns and fulfills the requirements identified in your February 2, 1996, letter.

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

Sincerely,

R. A. Newton
for Bob Link
Bob Link
Vice President
Nuclear Power

Attachment

cc: NRC Resident Inspector
NRC Regional Administrator, Region III

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RESPONSE TO NOTICE OF VIOLATION
INSPECTION REPORTS 50-266/95015 (DRP); 50-301/95015 (DRP)

WISCONSIN ELECTRIC POWER COMPANY
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2
DOCKETS 50-266 AND 50-301
LICENSE NOS. DPR-24 AND DPR-27

During a routine safety inspection performed by Messrs. T. Kobetz and A. McMurtray from November 17, 1995, through January 10, 1996, a violation of 10 CFR 50 Appendix B Criterion V was identified. This violation occurred due to the failure to document the foreign material exclusion (FME) inspection that is conducted by a supervisor during the performance of Routine Maintenance Procedure (RMP) 96. This inspection and signoff is required by administrative procedure NP 8.4.10 for safety related systems.

The identified violation was classified as Severity Level IV. Inspection Report Nos. 50-266/95015 and 50-301/95015 and the Notice of Violation (Notice) transmitted to Wisconsin Electric on February 2, 1996, provide details regarding the violation. We agree that the events and circumstances described in the Notice of Violation are accurately characterized.

In accordance with the instructions provided in the Notice, our reply to the alleged violation includes: (1) the reason for the violation, or if contested, the basis for disputing the violation; (2) corrective action taken; (3) corrective action to be taken to avoid further violations; and (4) the date when full compliance will be achieved.

VIOLATION:

"10 CFR 50, Appendix B, Criterion V requires that activities affecting quality shall be prescribed by procedures appropriate to the circumstances and shall be accomplished in accordance with these procedures. Procedures shall include appropriate quantitative or qualitative acceptance criteria for determining that important activities have been accomplished satisfactorily.

NP 8.4.10, Revision 0, "Exclusion of Foreign Material from Plant Components and Systems," Step 7.3.1 required that safety-related component closure procedures have a signoff documenting that a foreign material exclusion inspection had been accomplished.

Contrary to the above, procedure RMP 96, Revision 14, "Reactor Head and Upper Internals Installation," which governed the final closure of the Unit 2 reactor vessel on December 1, 1995, was not appropriate to the circumstances in that it did not contain the foreign material exclusion inspection signoff."

RESPONSE TO VIOLATION:

1. REASON FOR VIOLATION

Maintenance management has reviewed the circumstances of this violation in context with ongoing efforts to improve performance related to foreign material exclusion. Issuance of procedure NP 8.4.10, "Exclusion of Foreign Material From Plant Components and Systems" and associated training of maintenance personnel have been our first steps. Improving our practices in this area of maintenance continues to be a high priority. Accordingly, this response identifies an area where FME controls have been implemented as common practice, but formal documentation requirements may not yet be stated in our procedure.

Inherently Inspective Nature of this Procedure:

Maintenance workers and supervision considered the final reactor vessel head O-ring surface cleaning and installation process to be inherently inspective and generally compliant with the FME guidelines. As described in RMP 96, Step 3.15.10 provides for vessel flange cleaning and inspection just prior to lowering the vessel head during step 3.15.12. As the flange is cleaned, it is inspected for any foreign material, and the worker returns to the point of origin. As standard practice, supervisors perform a final inspection of the flange prior to closure. This inspection is not documented with a formal signoff. NP 8.4.10 requires a documented signoff for such an inspection.

Incomplete Review of Plant Procedures for NP 8.4.10 Compliance:

When NP 8.4.10 was issued, a dedicated review of all maintenance procedures was not conducted to ensure implementation of the procedural requirements of NP 8.4.10. Rather, it was a management decision to implement FME controls and signoffs for affected procedures during the course of the procedures upgrade project and the scheduled, required review of those procedures.

2. CORRECTIVE ACTION TAKEN

We have reviewed Routine Maintenance Procedure (RMP) 96 and identified the appropriate step which will have a foreign material exclusion (FME) inspection signoff.

3. CORRECTIVE ACTION TO BE TAKEN TO AVOID FURTHER VIOLATIONS

- a. RMP-96 will be revised to include appropriate FME controls prior to the upcoming Unit 1 outage.
- b. Other RMPs to be used during the Unit 1 refueling outage will be revised as necessary to include appropriate FME controls and documentation prior to the outage.
- c. Remaining RMPs will be revised as necessary to include appropriate FME controls by July 31, 1996.
- d. The procedure governing FME controls (NP 8.4.10) will be revised to more clearly describe the defense-in-depth approach to implementing FME controls.

4. DATE WHEN FULL COMPLIANCE WILL BE ACHIEVED

Full compliance will be achieved July 31, 1996.