

FEB 5 1985

Docket Nos. 50-266
and 50-301

Mr. C. W. Fay, Vice President
Nuclear Power Department
Wisconsin Electric Power Company
231 West Michigan Street, Room 308
Milwaukee, Wisconsin 53201

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Dear Mr. Fay:

SUBJECT: SUPPLEMENT 1 TO NUREG-0737 - REQUEST FOR MODIFICATION
OF COMMISSION ORDER DATED JULY 2, 1984
POINT BEACH NUCLEAR PLANT, UNITS 1 AND 2

By letter dated October 26, 1984, as supplemented by letters dated December 6 and December 12, 1984, you requested an extension for the completion dates for certain items contained in the Commission's Order dated July 2, 1984 for the Point Beach Nuclear Plant Units 1 and 2. Specifically, you have requested an extension of the completion dates for implementation of upgraded Emergency Operating Procedures (EOPs) from January 31, 1985 until July 1, 1985 and an extension of the date for completion of emergency power to the Technical Support Center from December 31, 1984 until January 21, 1985. The Commission Order allows that an extension of time may be granted by the Director, Division of Licensing, for good cause shown.

You stated in your October 26 and December 6, 1984 submittals that the verification process for your EOPs, as described in your Emergency Operations Procedures Generation Package, has been more difficult and time-consuming than expected. Many of the delays have occurred due to time required for familiarization of the verification team with the procedure writer's guide and the verification process itself. Further ongoing delays result from the detailed documentation required during the verification process to ensure that all identified discrepancies have been properly resolved. You have stated that, where practicable, interim procedures are in place and existing procedures have been modified to incorporate the use of new systems and equipment. Efforts have also been made to speed up the verification process, including use of contractor personnel and scheduled overtime for verification team members. You do not expect that the assignment of additional personnel would appreciably speed up the process due to training time and familiarization necessary to ensure continuity and the qualification levels required of the verification team members.

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You have also indicated that, if the existing EOPs were implemented "as is" prior to completion of the verification process and 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.

With respect to your second extension request relating to the emergency power for the Technical Support Center, you have indicated that vendor delays in equipment delivery beyond your control have kept you from completing the installation of the emergency power supply transfer switching by December 31, 1984. You have obtained a firm delivery date and have committed to completion of installation and testing by January 21, 1985.

Based on your submittals, we find that you have shown good cause for the delays, the delays requested are reasonable, and you have made a good faith effort to comply with the schedule contained in the Commission's Order of July 2, 1984. Further, you have taken reasonable steps where possible to minimize the delays and their associated impact. Therefore, in accordance with the terms of the July 2, 1984 Commission Order, we conclude that there is adequate justification for modification of the Commission's Order and hereby grant the requested delays.

For your convenience we are enclosing an updated table of the schedule contained in the Commission's Order.

Sincerely,

Frank Miraglia/for

Darrell G. Eisenhut, Director
Division of Licensing

Enclosure:
As stated

ORB#3:DL
PKreutzer
1/28/85

ORB#3:DL
TColburn:dd
1/28/85

ORB#3:DL
JRMiller
1/28/85

ORB
GHolahan
2-11/85
kday
OELD
1/29/85

AD:DL
GCLinas
1/29/85

D:DIR
DGEisenhut
2/1/85

LICENSEE'S COMMITMENTS ON SUPPLEMENT 1 TO NUREG-0737

TITLE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)
1. Safety Parameter Display System (SPDS)	1a. Submit a safety analysis and an implementation plan to the NRC.	April 30, 1985
	1b. SPDS fully operational and operators trained.	December 31, 1985
2. Detailed Control Room Design Review (DCRDR)	2a. Submit a program plan to the NRC.	Complete
	2b. Submit a summary report to the NRC including a proposed schedule for implementation.	October 31, 1985
3. Regulatory Guide 1.97 - Application to Emergency Response Facilities	3a. Submit a report to the NRC describing how the requirements of Supplement 1 to NUREG-0737 have been or will be met.	Complete
	3b. Implement (installation or upgrade) requirements.	December 31, 1985

LICENSEE'S COMMITMENTS ON SUPPLEMENT 1 TO NUREG-0737

TITLE	REQUIREMENT	LICENSEE'S COMPLETION SCHEDULE (OR STATUS)
4. Upgrade Emergency Operating Procedures (EOPs)	4a. Submit a Procedures Generation Package to the IIRC.	Complete
	4b. Implement the upgraded EOPs.	July 1, 1985
5. Emergency Response Facilities	5a. Technical Support Center fully functional.	Building complete. Emergency power available January 21, 1985
	5b. Operational Support Center fully functional.	Complete
	5c. Emergency Operations Facility fully functional.	December 1985